

Office of Waste Management Compliance Assurance and Emergency Response 1356 Hansford Street Charleston, WV 25301-1401 304-558-5989/Fax 304-558-0256

## West Virginia Division of Environmental Protection

Cecil H. Underwood Governor Michael P. Miano Director

March 26, 1999

## CERTIFIED MAIL RETURN RECEIPT REQUESTED

Richard Quaranta Sr. Environmental Specialist Johns Manville Corporation P.O. Box 5130 Vienna, WV 26105-5130

Dear Mr. Quaranta:

Enclosed is a copy of the Compliance Inspection Evaluation (CEI) Report completed by a representative of the Chief of the Office of Waste Management. This report is based on the inspection conducted on March 15, 1999.

Please refer to the **Notice of Violation** for those violations discovered during the course of this inspection. As a result of those violations, this report is being referred for the following action:

	Correct noted violations
$\overline{x}$	Notice of Violation
	Civil and Administrative Penalty (CAP)
	Enforcement Referral

A copy of this report is being transmitted to the United States Environmental Protection Agency (U.S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation. If you have any questions concerning the inspection or the attached report, please to contact Inspector Dale L. Gable at (304) 420-4635.

Sincerely,

Thomas A. Fisher

Field Operations Program Manager

Sharras a fil

Compliance Assurance and Emergency Response

TAF/kw

cc:

Marie Owens, U.S. EPA Region III

Inspector Dale L. Gable

File

"To use all available resources to protect and restore West Virginia's environment in concert with the needs of present and future generations."





Compliance Assurance and Emergency Response 2311 Ohio Avenue Parkersburg, WV 26101

304-420-4635 \ Fax: 304-420-4554

## West Virginia Division of Environmental Protection

Cecil H. Underwood Governor Michael P. Miano Director

## NOTICE OF VIOLATION

DATE: March 15, 1999

ISSUED TO: Johns Manville Corporation

EPA ID#: WVD082243502

FACILITY MAILING ADDRESS: P.O. Box 5130, Vienna, WV 26105-5130

FACILITY REPRESENTATIVE: Mr. Richard Quaranta, Sr. Environmental Specialist

On the date and time specified, an authorized agent of the Chief of the Office of Waste Management conducted an inspection of the facility described above in accordance with West Virginia Code, Chapter 22, Section 189 and\or an Order or Permit issued pursuant to §22-18. During that inspection, the following violation(s) were noted:

1. A. (Regulation) 40 CFR §262.11

B. Johns Manville Corp. has failed to perform a hazardous waste determination on its waste petroleum naphtha.

# In order to attain compliance with the cited Code and\or Regulations, you must perform the following remedial actions:

- 1. Within 30 days of the receipt of this Notice, perform a hazardous waste determination on a representative sample of your waste petroleum naphtha. The determination shall include, at a minimum, a laboratory analysis for TCLP Volatiles, TCLP Semi-Volatiles, TCLP RCRA metals and Flashpoint.
- 2. Within 35 days of the receipt of this Notice, reply to this inspector, in writing, as to the completion of No. 1 above.

A copy of this Notice of Violation will be forwarded to the Enforcement Unit of the Office of Waste Management. The issuance of the Notice may result in an administrative civil penalty being levied in accordance with West Virginia Code § 22-18-17.

District Phone: (304) 420-4635 Issued By: Dale L. Gable

District Fax. (304) 420-4554 Title: Environmental Inspector

## INSPECTION FACT SHEET

**COMPANY NAME:** Johns Manville Corporation

**EPA ID #:** WVD082243502

MAILING ADDRESS: P.O. Box 5130

**FACILITY TYPE: SQG** 

Vienna, WV 26105-5130

LOCATION: 2905 3rd. Avenue

**COUNTY:** Wood

**PHONE:** 304-295-1201

**HANDLING CODES: S01** 

FACILITY CONTACT: Richard Quaranta, Sr. Environmental Specialist

INSPECTION TYPE: Compliance Evaluation Inspection

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act, Chapter 22-18, and 40 CFR Parts 260-265.

#### HAZARDOUS WASTES GENERATED:

(For Conditionally Exempt and Small Quantity Generators, list type of waste, amount generated, and how disposed.)

- 1) Waste Petroleum Naphtha Pending hazardous waste determination 306kg to491kg\month (when generated 2-3 times \ year) Safety Kleen Corp.
- 2) Waste Paint Related Material D001, F003, F005 30.24 kg\month
- 3) Waste Compound Cleaning Liquid D006, D008, D018, D027, D039, D040 45 kg\month (when generated three (3) times \ year) Safety Kleen Corp.

**DATE INSPECTED:** March 15, 1999

**INSPECTORS:** 

(1) Dale L. Gable, WV DEP\OWM

**VIOLATIONS:** 

Y

(2) Kevin Campbell, WV DEP\OWM

DATE PREPARED: March 17, 1999

PREPARED BY:

Dale L. Gable

## COMPLIANCE EVALUATION INSPECTION

RE:

Johns Manville Corporation

2905 3rd Avenue

Vienna, WV

EPA Identification Number: WVD082243502

DATE INSPECTED: March 15, 1999

INSPECTED BY:

Dale L. Gable, WV DEP\OWM

Kevin Campbell, WV DEP\OWM

REPORT BY:

Dale L. Gable

On March 15, 1999 this inspector and Kevin Campbell, Environmental Inspector, conducted a Compliance Evaluation Inspection of Johns Manville Corporation in Vienna, WV. Upon our arrival, for this unannounced inspection, we were met by Mr. Richard Quaranta, Sr. Environmental Specialist. Upon presentation of appropriate credentials, we advised Mr. Quaranta of our authority as representatives of the Director of the WV Division of Environmental Protection and of the Chief of the Office of Waste Management. Mr. Quaranta was informed that this inspection would emphasize his company's compliance with the WV Hazardous Waste Management Act (Chapter 22, Article 18) and the rules promulgated thereunder.

Johns Manville Corporation (hereinafter "Manville") is a manufacturer of automotive fiberglass panels, acoustical panels and air filtration media. Before 1992, Manville also manufactured its own glass on site, but now purchases the glass from other Manville sources. Through the use of natural gas jets, fiberglass is made from glass marbles. The fiberglass is pressed into the various shapes needed for each manufactured product.

(CEI) Johns Manville Corporation EPA ID Number: WVD082243502 March 15, 1999

Page 2

The following waste streams are currently generated by Manville:

- Waste Petroleum Naphtha\*\*: Currently classified as Non-Hazardous (According to Safety Kleen Corp. classification). This waste stream is generated 2-3 times per year (306kg-491kg per occurrence).
  - \*\* Manville has failed to perform a hazardous waste determination on this waste stream. Safety Kleen Premium Solvent oftentimes contains levels of contaminants that exceed hazardous characteristic levels. According to Mr. Quaranta, Safety Kleen personnel have represented their Premium Solvent as non-hazardous in nature.
- 2. Waste Paint Related Material: D001, F003, F005. Manville currently generates 800 pounds of this waste stream per year (30.24 kg\month).
- Waste Compound Cleaning Liquid (Monoethanolamine): D006, D008, D018, D027,
   D039, D040. Manville currently generates this waste stream three (3) times per year (45 kg per occurrence).
- Used Oil: This non-hazardous but regulated waste stream is removed from the site by Safety Kleen Oil Recovery Services.

The following treatment, storage and disposal facilities are listed on hazardous waste shipping manifests by Manville as designated facilities:

1. Safety Kleen Corporation, Poco, WV

(CEI) Johns Manville Corporation EPA ID Number: WVD082243502 March 15, 1999 Page 3

WVR000001446

- Safety Kleen Corporation, Dolton, IL
   ILD980613913
- Chemtron Corporation, Avon, OH
   OHD066060609
- Safety Kleen Corporation, Smithfield, KY
   KYD053348108

Pending a complete hazardous waste determination, Manville's generator status is either a Conditionally-Exempt Small Quantity Generator or a Small Quantity Generator. Manville, however, manages its' hazardous waste in a manner representative of a Small Quantity Generator. Due to this reasoning, the inspection was conducted under the regulatory scheme of a 100 kg\month to 1,000 kg\month, Small Quantity Generator.

During the office portion of the inspection, the following items of compliance were noted:

- Arrangements with local emergency response agencies have been completed and are annually updated.
- 2. The primary emergency coordinator for the facility is Richard Quaranta. Mr. Quaranta is familiar with his duties during an emergency.
- 3. Emergency telephone numbers, as well as the telephone numbers of the primary and secondary emergency coordinators are posted next to a telephone.
- 4. Employees involved in hazardous waste management are trained in proper waste

(CEI) Johns Manville Corporation EPA ID Number: WVD082243502 March 15, 1999

Page 4

handling and emergency procedures.

- 5. Since the facility is a Small Quantity Generator, no Waste Minimization certification is required by the US EPA.
- 6. Hazardous waste shipping manifests and land ban certifications are contingent on the hazardous waste determination performed on the Safety Kleen Premium solvent.

Following the office paperwork examination, we began the physical inspection of the facility.

The physical inspection included the Hazardous Waste Storage area, the Used Oil Storage area,
the Paint Shop, the Paint Booth, the Towmotor Repair Shop, the Pump Shop and the Caustic

Cleaning area.

The Hazardous Waste Storage area is a non-permitted short term storage area for hazardous waste. At the time of the inspection, no hazardous wastes were being stored in the area.

Adjacent to the Hazardous Waste Storage area was the Used oil Storage area. Twenty-two (22) 55-gallon drums of used oil were being stored in the area. All of the containers were marked or labeled as "Used Oil". In addition, three (3) 55-gallon drums of waste tetradymer dyes (non-hazardous) were being stored in the area.

In the Paint Shop, we noted the storage of one (1) 55-gallon drum of waste paint related material (D001, F003, F005). The container was labeled as "Hazardous Waste". The container was being used as a satellite storage unit, at or near the point of generation. No accumulation start date is required for the first 55 gallons stored in the satellite storage area. However, within three (3) days of the accumulation of over 55 gallons, the container holding the excess

(CEI) Johns Manville Corporation

EPA ID Number: WVD082243502

March 15, 1999

Page 5

accumulation of hazardous waste must be marked with the date upon which the excess hazardous

waste began accumulating, as well as meet the other applicable pre-transport requirements of 40

CFR §262.34. The Paint Booth is located adjacent to the Paint Shop. The Paint Booth filters are

analyzed on an annual basis for TCLP RCRA metals. According to Mr. Quaranta, the filters

have consistently remained non-hazardous for years.

In the Towmotor Repair Shop, maintenance is performed on fork trucks. One (1) Safety

Kleen(SK) basin, holding SK Premium Solvent, is used to clean parts in the maintenance area.

No areas of violation were noted in the area.

The Machine Shop is an area dedicated to the repair and fabrication of various machine parts.

One Safety Kleen basin, holding SK Premium Solvent, was noted to be used in this area. No

areas of violation were noted in the Machine Shop.

The Pump Shop is an area where facility pumps are tested and repaired. Two Safety Kleen

immersion cleaner units are used in the area to clean various pumps and pump parts. Spent SK

immersion cleaner is a RCRA hazardous waste (D006, D008, D027, D039 and D040). However,

while the immersion cleaner remains in an active process unit, it is not a waste. Safety Kleen

personnel remove the spent solvent from the units, during routine service trips.

In the Caustic Cleaning area, resins from various pumps and headers are cleaned with a

caustic (NaOH) solution. The spent solution is neutralized on site and discharged into the City of

Parkersburg POTW.

Following a brief meeting with Mr. Quaranta, we thanked him for his cooperation, then

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departed the facility at 1117 hours.

## **COMPLIANCE EVALUATION**

See the Notice of Violation in the attachments of this report.



Office of Waste Management Compliance Assurance and Emergency Response 2311 Ohio Avenue

> Parkersburg, WV 26101 304-420-4635 \ Fax: 304-420-4554

## West Virginia Division of Environmental Protection

Cecil H. Underwood Governor Michael P. Miano Director

April 5, 1999

Richard Quaranta, Sr. Environmental Specialist Johns Manville Corporation P.O. Box 5130 Vienna, WV 26105-5130

Dear Mr. Quaranta:

I am in receipt of your response to the March 15, 1999 Notice of Violation, as well as the attached laboratory analysis. Since the detection limits for nearly all of the TCLP analytes exceeded the regulatory concentration limits, the waste cannot reasonably be classified as non-hazardous. Your decision to reclassify the spent parts washer solvent as hazardous waste is prudent, due to the matrix interference in the laboratory analysis.

Johns Manville Corporation has complied with all of the requirements of the March 15, 1999 Notice of Violation, including the analytical and reporting requirements. I appreciate your cooperation and assistance during the inspection and your promptness in the timely submission of the requested information.

Sincerely,

Dale L. Gable, Environmental Inspector





April 1, 1999

DEEP CONTREE OF WASTE MANAGEMENT

West Virginia Division of Environmental Protection

Office of Waste Management Compliance Assurance and Emergency Response 2311 Ohio Avenue Parkersburg, WV 26101

Johns Manville Corporation EPA ID# WVD082243502 P.O. Box 5130, Vienna, WV 26105-5130

To: Dale L. Gable; Environmental Inspector

Dale:

In accordance with the terms of your inspection letter dated March 15, 1999, please find enclosed a copy of the lab analysis for TCLP, Volatiles, TCLP Semi-Volatiles, TCLP RCRA metals and Flashpoint as requested for the waste determination on the plant's parts cleaner solvent. Results of the lab analysis indicate that the parts washer solvent is non-hazardous.

Based on these analytical data and Johns Manville's process knowledge, JM's shipments with Safety - Kleen made in the past, as non-hazardous waste have been in compliance with West Virginia regulations.

With respect to any future shipments of this parts cleaner solvent with Safety Kleen, to avoid any risk of future non-compliance, JM will reclassify it as hazardous waste, and it will be handled and transported accordingly.

As per our discussion, please follow-up with a letter of closure on the NOV so that we have on file.

If you have any questions, please call me anytime at 295-1201.

Sincerely,

Richard Quaranta

Sr. Environmental Specialist

Richard Quaranta

Date: 03/25/99 Date Received: 03/18/99

Date Extracted: 03/18/99 Dtae Analyzed: 03/22/99

Analysis For : Johns Manville

TRANS-ENVIRO # : 990318-13-A

Customer I.D. : Parts Washers

### TCLP CONTAMINANTS

PARAMETER/(EPA_HW_No.1)		DL mg/Kg	RL mg/L	RESULTS mg/Kg
Benzene	(D018)	25*	0.5	BDL
Carbon tetrachloride	(D019)	25*	0.5	BDL
Chlorobenzene	(D021)	25	100.0	BDL
Chloroform	(D022)	25*	6.0	BDL
o-Cresol	(D023)	50	200.0	$\mathtt{BDL}$
m&p-Cresol (D024	1,D025))	100	200.0	$\mathtt{B}\mathtt{D}\mathtt{L}$
Cresol, total	(D026)	150	200.0	BDL
1,4-Dichlorobenzene	(D027)	25*	7.5	BDL .
1,2-Dichloroethane	(D028)	25*	0.5	BDL
1,1-Dichloroethylene	(D029)	25*	07	BDL
2,4-Dinitrotoluene	(D030)	50*	0.13	$\mathtt{BDL}$
Hexachlorobenzene	(D032)	50 <b>*</b>	0.13	$\mathtt{BDL}$
Hexachlorobutadiene	(D033)	50*	0.5	BDL
Hexachloroethane	(D034)	50*	3.0	$\mathtt{BDL}$
Methyl ethyl ketone	(D035)	250*	200.0	BDL
Nitrobenzene'	(D036)	50*	2.0	$\mathtt{BDL}$
Pentachlorophenol	(D037)	250*	100.0	$\mathtt{BDL}  \cdot$
Pyridine	(D038)	50*	5.0	BDL
Tetrachloroethylene	(D039)	25*	0.7	$\mathtt{BDL}$
Trichloroethylene	(D040)	25*	0.5	$\mathtt{BDL}$
2,4,5-Trichlorophenol	(D041)	50	400.0	BDL
2,4,6-Trichlorophenol	(D042)	50*	2.0	BDL
Vinyl chloride	(D043)	25 <b>±</b>	0.2	BDL

<sup>\*</sup> Detection limits raised due to matrix interference.

DL = Detection Limit BDL = Below Detection Limit RL = Regulatory Limit 1 = Hazardous Waste Number

Method: EPA SW 846(8260,8270,1311)

## SURROGATE RECOVERIES

TRANS-ENVIRO # : 990318-13-A

Customer I.D. : Parts Washers

SURROGATE	% RECOVERY	ACCEPTABLE LIMITS						
Volatile Organic Compounds								
Dibromofluoromethane Toluene-d8 Bromofluorobenzene	109 88 90	90 - 125% 77 - 115% 89 - 113%						
Semi-Volatile Organic Compounds								
Nitrobenzene-d5 2-Fluorobiphenyl Terphenyl-d14 2-Fluorophenol Phenol-d6 2,4,6-Tribromophenol	62 129 125 61 90 27	26 - 130% 10 - 114% 19 - 153% 34 - 143% 21 - 153% 10 - 183%						

Date: 03/29/99

Date Received: 03/18/99
Date Extracted: 03/18/99
Date Analyzed: 03/24-29/99

Analysis For : Johns Manville

TRANS-ENVIRO # : 990318-13-A

Customer I.D.: Parts Washers

### CHARACTERISTIC of TCLP METALS

ELEMENT/(E	PA HW No.1)	DL mg/L	RL mg/L	RESULTS mg/L
Arsenic	(D004)	0.336	5.0	BDL
Barium	(D005)	0.15	100.0	BDL
Cadmium	(D006)	0.27	1.0	BDL
Chromium	(D007)	0.26	5.0	BDL
Lead	(D008)	1.36	5.0	BDL
Mercury	(D009)	0.004	0.2	BDL
Selenium	(D010)	0.05	1.0	BDL
Silver .	(D011)	0.09	5.0	BDL

RL = Regulatory Limit

DL = Detection Limit

BDL = Below Detection Limit

1 = Hazardous Waste Number

Methods : Extraction - EPA SW 846(1311)

Mercury - EPA SW 846(7470) Selenium - EPA SW 846(6020)

Other metals - EPA SW 846(6010)

Date: 03/25/99

Date Received : 03/18/99

Date Analyzed: 03/26/99

Analysis For : Johns Manville

TRANS-ENVIRO # : 990318-13-A

Customer I.D. : Parts Washers

PARAMETER	METHOD	<u>DL</u>	RESULTS
Ignitability	EPA SW 846(1010)	N.A.	159°F

Method Blank EPA SW 846(1010) N.A. N.A.

DL = Detection Limit BDL = Below Detection Limit N.A. = Not Applicable change name, mailing address, contact, contact address, owner, owner address, type

## RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM MAINTENANCE FORM FOR EPA NOTIFICATION

1. EPA-ID# WVDO82243502 Date: 7-14-97
11. FACILITY NAME Schuller International Inc
Name Change Opne Manyille Corporation.  III. LOCATION OF INSTALLATION
Street
City/Town State Zip
County Code County Name
IV. INSTALLATION MAILING ADDRESS
Street
City/Town State Zip
V. INSTALLATION CONTACT
Last Name Quaranta First Richard
Job Title Sr Environmental Phone # (304) 295-1201
VL INSTALLATION CONTACT ADDRESS
Street PD Box 513D
City/Towns State Zip
Name of Legal Owner John & Manyille Corw
Street
City/Town State Zip
Phone # ( ) Land Type Owner Type
IX. WASTE CODES
Delete Old Waste Codes  Add New Waste Codes
Updated in RCRIS by: HS7 Date: 7-17

		Type		RCRA Status	Reg.		RCRA Reg. Desc.
1.	Generator						<u>.</u>
2.	Transporter						
3.	TSD	·		·			
	Mode of Transportation	on for Transporter Rail	Highway		Water	Other	<u>-</u> -
4.	HWF Burner/Blender				•	٠	
	B D	Boiler and/or Inc BIF only; Smelte	dustrial Furnac er Deferral.	e (BIF)	only.		
	E N	BIF only; Small Not a Burner/Ble	Quantity Exen	nption Cl	aimed.		•
	X	Other Burner/Ble Unverified.				•	
a.	HWF Marketing to Bu	ırner:			·.		•
	X	Code indicates the				in mar	keting
b.	HWF Other Marketer	<b>3:</b>		÷			
	X	Code indicates the marketing activit	nat the Handle ies other than	r is enga generato	ged in hazardor r marketing to	us waste burner.	fuel
c.	HWF Boiler/Industria				•		
	B X	Boiler and/or Inc Indication of Act	iustrial Furnac ivity.	e (BUF)	o <b>nly</b> .		
5.	Underground Injection X	n Control:  Code indicates the disposes of hazar installation.	nat the Handle dous waste an	er generat d has an	tes and/or treats injection well l	s, stor <del>e</del> s, located a	or t the
		VIII B. Used C	il Recycling	Activi	ies		
1.	Used Oil Recycling Ac	tivities	•		•		
а.	Used Oil Marketer to X	Burner: Marketer directs	shipments of us	ed oil to b	urners.		
ъ.	Used Oil Other Marks	ter: Handler is engag generator market					an
<b>2.</b>	Used Oil Burner:	Indication of Ac	tivity.	•	.* .		
	Burner Types: Utility H=Haz	Boiler zardous Waste Fuel	Industrial U=Used	Boiler I Oil Fuel		ustrial Fu	irnace
<b>3.</b>	Used Oil Transporter: T=Tra		F=Transfer		B=Both		÷
<b>4.</b> .	Used Oil Processor/Re	-	P=Pafine Only		R=Both		

VIII A. Hazardous waste Activity

RCRIS: Notification View Screen 2 of 6 \* Merge Send: Y \*EPA ID: WVD082243502 Other ID: \*Date Received (MMDDYY): 042881 Source ( N/E/S ): N Non-Notifier Flag: \*Date Acknowledged (MMDDYYYY): 04221992 Send Acknowledgement: \*Name of Installation: SCHULLER INTERNATIONAL INC Installation Location Address \*Streets: 2905 3RD AVE State: WV Zip: \*City: VIENNA \*County Code: 107 County Name: WOOD Installation Mailing Address \*Streets: PO BOX 5130 \*City: State: WV Zip: 26105 VIENNA Contact Information Last Name First Name Title Phone Address (M, L, O) PLANT MGR 3042951232 \* SEPKO ANDREW 2905 3RD AVE \*Streets: State: WV Zip: 26105 \*City: VIENNA

\*Land Type: P

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

RCRIS: Notification View Screen 3 of 6 \* \* EPA ID: WVD082243502 Other ID: Source: N \* Owner Sequence Number: 1 \* Ownership: MANVILLE CORP Type of Owner: P Address of Owner/Operator Street: 717 17TH ST State: CO Zip Code City: DENVER 80202 Phone: 3039782000

\* Current/Previous Indicator: CO Change Date (MMDDYY):

\* \* Enter-Continue F1-Previous Screen F3-Exit F5-Curr. Owner

F8-Help F9-First F10-Next \* F6-Prev. Owner

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

RCRIS: Notification View Screen 4A of 6 \* \* EPA ID: WVD082243502 Other ID: Source: N RCRA Reg RCRA Reg State Reg State Reg \* Waste Activity Type Status Desc Status Desc \* ---------2 \* HW Generator: R \* HW TSD: \* HW Transporter: \* Transport Mode: Air: Rail: Highway: Water: Other: \* HW Burner/Blender: \* NHW Used Oil Recycler: \_\_\_\_\_\_ \* Underground Injection Control: \* Recycler: \*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

\* Enter-Continue F1-Previous Screen F3-Exit F8-Help

\*

KCKIS: Notlitication View Screen 5 of 6 WVD082243502 Other ID: Source: N Hazardous Waste Codes: Specific/Non-Specific/Commercial/Chemical D002 D007 D000 D001 D006 D008 D018 D021 D027 D039 D040 F003 F005 \*

\*Enter-Continue

F1-Previous Screen

F3-Exit

\*F8-Help F9-First

F10-Next

for Filling Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



## Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received (For Official Use Only

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A. Hazardous W	asie Activity			B. U	sea VII He	ecycling Activ
1. Generator (See Instructions) a. Greater than 1000kg/mo (2,200 lbs.) b. 100 to 1000 kg/mo (200-2,200 lbs.) c. Less than 100 kg/mo (220 lbs) 2. Transporter (Indicate Mode in boxes 1-5 below) a. For own waste only b. For commercial purposes  Mode of Transportation 1. Air 2. Rail 3. Highway 4. Water 5. Other - specify	Installar require instruction instruction in the instruction of the instruction in the in	ous Waste Fuerator Marketing or Marketers or and/or Indus Smelter Defer Small Quantity te Type of C	i permit is ctivity; see el ng to Burner trial Furnace al Exemption Combustion er	B. Ma Oil Db. Ma Comb Comb a. Ut Db. Inc Co. Inc 3. Used of Ac B. Tr Used Type La. Pr	to Off-Spe rketer Who Meets the Oil Burne sustion Dev lifty Boller fustrial Boll fustrial Fur Oil Transp tivity(les) ansporter	cts Shipment of celfication Burn of First Claims to Specifications of a findicate Typice(s)  Iller  Trace  Trace  The corter - Indicate  Ility  Sor/Re-refiner-
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. Other Wastes. (State or other wastes req	uiring a handler	to have an I.D.	number; Se	e instructior	s.)	
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**Notifications** 





#### DEPARTMENT OF COMMERCE, LABOR & ENVIRONMENTAL RESOURCES

#### DIVISION OF ENVIRONMENTAL PROTECTION

Gaston Caperton Governor John M. Ranson

**Cabinet Secretary** 

1356 Hansford Street Charleston, WV 25301-1401

February 23, 1994

David C. Callagha Director Ann A. Spaner Deputy Director

Ms. Christine Burkett
Environmental Specialist
Schuller International, Inc.
P.O. Box 5130
Vienna, West Virginia 26105-5130

Dear Ms. Burkett:

Enclosed is a copy of the Compliance Evaluation Inspection (CEI) Report completed on your facility by a representative of the Chief from the Office of Waste Management. This report is based on the inspection conducted on February 18, 1994.

There were no areas of non-compliance with the appropriate Hazardous Waste Management Regulations documented during the inspection.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or attached report, please feel free to contact this office at (304) 558-5989.

Sincerely,

H. Michael Dorsey, Assistant Chief Compliance Monitoring/Enforcement

Office of Waste Management

kw

Enclosure

cc: Jeanne Soffold, II.S. MPA: Region IIII
Dale Gable, Inspector

Permits Section

File

Speech/Hearing Impaired TDD 1-800-642-6700

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#### INSPECTION FACT SHEET

<u>COMPANY NAME:</u> Schuller International, Inc.

I.D. #: WVD082243502

MAILING ADDRESS: P.O. Box 5130

Vienna, WV 26105-5130

TYPE OF FACILITY: SQG

LOCATION: 2905 Third Avenue

Vienna, WV

COUNTY: Wood

COMPANY CONTACT: Ms. Christine Burkett, Environmental Specialist HANDLING CODES: S01

TELEPHONE: (304) 295-1232

**PURPOSE:** Compliance Evaluation Inspection

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act, Chapter 20-5E; West Virginia Administrative Regulations for Chapter 20-5E;

and/or 40 CFR, Parts 260-299.

#### LIST OF CHEMICALS:

(For Small Quantity Generators, list amount of waste, how it is handled, where it goes)

1) Waste Petroleum Naptha - D001, D018, D039

- 2) Waste Immersion Cleaner D006, D007, D008, D018, D021, D027, D039, D040
- 3) Waste Paint Related Material D001, F003, F005
- 4) Waste Paint Filters Occasionally D007
- 5) Waste Corrosives D002

Quantity/Month: 386.5 kg

Disposal Company: Safety Kleen Corporation

DATE INSPECTED: February 18, 1994

\_\_ VIOLATIONS

\_X\_ NO VIOLATIONS

INSPECTORS: Dale L. Gable, WV DEP/OWM

Kevin Campbell, WV DEP/OWM

DATE PREPARED: February 18, 1994

PREPARED BY: Dale L. Gable

#### INSPECTION REPORT

<u>Subject:</u> Compliance Evaluation Inspection of Schuller International, Inc. in Vienna, WV. <u>Inspection Date:</u> February 18, 1994.

<u>Inspected by:</u> Dale L. Gable, WV DEP/Office of Waste Management Kevin Campbell, WV DEP/Office of Waste Management

On February 18, 1994 this inspector and Kevin Campbell, Environmental Inspector, conducted a Compliance Evaluation Inspection (CEI) of Schuller International, Inc. in Vienna, WV. Upon our arrival at 1041 hours, for this unannounced inspection, we were met by Ms. Christine Burkett, Environmental Specialist and later by Mr. Roger Snow, Plant Manager. Upon presentation of appropriate credentials, I advised Ms. Burkett of our intentions to conduct an inspection of the facility in order to monitor compliance with the West Virginia Hazardous Waste Management Regulations.

Schuller International, Inc. in Vienna, WV is a manufacturing facility for the production of fiberglass insulation, primarily for the automobile industry. In 1990, the facility rebuilt their furnace and stack linings, removing chromium refractories, replacing them with non-chromium refractories. In 1992, the entire glass production portion of the facility was closed. The facility currently purchases glass marbles from outside sources for its fiberglass production process. The most significant hazardous waste stream generated by the facility was deleted when the chromium refractories were removed and the process discontinued.

The facility currently generates the following hazardous wastes:

Waste Code

Petroleum Naptha D001, D018, D039

Immersion Cleaner D007, D008, D006, D018, D021, D027, D039, D040

Waste Paint D001, F003, F005

Paint Filters Occasionally D007

Corrosives D002

Schuller International, Inc. generates approximately 386.5 kg/month of these hazardous wastes. The waste petroleum naptha and immersion cleaner are generated in Safety Kleen parts cleaning basins. The waste paint related material is generated in a Safety Kleen paint gun cleaner. The paint filters are generated in a paint booth in the painting area and are only occasionally hazardous for TCLP chromium. The waste corrosives are infrequently generated in various plant maintenance operations. The volumes of waste generated will var slightly, month to month, depending on the various maintenance projects which are undergoing. The facility is currently classified as a Small Quantity Generator of hazardous waste.

During the office portion of the inspection, the facility contingency plan, hazardous waste shipping manifests, land-ban certifications and waste generation records were examined and found to be complete and in good order. The facility is keeping their emergency contingency plan current due to the possibility of any future return to full generator status.

During the physical inspection of the facility we examined the hazardous waste drum storage area, the maintenance areas containing the Safety Kleen parts cleaning basins, the painting area and the emergency telephone area. All of the containers holding hazardous waste in each of the areas were labeled and dated properly, closed and in good condition. All required information was posted next to the emergency telephone, including the name and telephone number of the Emergency Coordinator, emergency telephone numbers and the locations of fire extinguishers.

Following a brief wrap-up meeting with Ms. Burkett, we thanked her for her assistance and departed the facility at 1126 hours.

### **COMPLIANCE EVALUATION**

No areas of violation were noted during the inspection.

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Places refer to the attractions for Filing Modification issued for Commission regulated from a required by the (Settlem 2010 of the Resource Commission and Settlem 2010 or the Resource Commission and Settlement 2010

# SEPA

# Notification of Regulated Waste Activity

Bate Received (For Official Use Only)

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## RESOURCE CONSERVATION AND RECOVERY INFORMATION SYSTEM MAINTENANCE FORM FOR EPA NOTIFICATION

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	FACILITY NAME Schuller International Inc
	New Facility Name
	Name Change
	Location of Installation
	Street
	City/TownStateZip
	County CodeCounty Name
-	Installation Mailing Address
Λ	street PO Box 513D
<del>/</del> _1.	City/TownStateZip
	Installation Contact
	Last Name Sepko First Andrew
Λ	Job Title Plant Manager Phone #(304)295-1232
Д	Street
	City/TownStateZip
	Ownership
	Name of Legal Owner
	Street
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# SEPA Regulated Waste

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72-E	วกากกระกษาที่
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*EPA Id: WVD082243502
                   Other Id:
                                         Merge Send: Y
                         Source ( N/E/S ): N Non-Notifier Flag:
*Date Received (MMDDYY): 042881
*Date Acknowledged (MMDDYYYY): 04221992
                                  Send Acknowledgement:
*Name of Installation: SCHULLER INTERNATIONAL INC
                Installation Location Address
*Streets:
        2905 3RD AVENUE
*City:
        VIENNA
                                    WV
                              State:
                                        Zip:
                                              26105
*County Code:
           107
                 County Name:
                            WOOD
                Installation Mailing Address
        PO BOX 5128
*Streets:
*City:
        VIENNA
                              State:
                                        Zip:
                                              26105
                  Contact Information
  Last Name
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              ROBERT
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* MASON
*Streets:
        2905 3RD AVENUE
        VIENNA
                              State:
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*City:
                                    WV
                                              26105
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Enter-Continue
                   F1-Previous Screen
                                      F3-Exit
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             RCRIS: Notification View Screen 3 of 6
*************************
* EPA Id:
          WVD082243502
                      Other Id:
                                         Source: N
 Owner Sequence Number:
                                          Type of Owner:
 Ownership: MANVILLE CORPORATION
                                                       Ρ
                  Address of Owner/Operator
     Street: 717 17TH STREET
           DENVER
                               State: CO Zip Code
                                               80202
     City:
           3039782000
     Phone:
 Current/Previous Indicator:
                       CO Change Date (MMDDYY):
***************
                               F3-Exit
                                            F5-Curr. Owner
Enter-Continue
              F1-Previous Screen
                               F9-First
                                            F10-Next
* F6-Prev. Owner
                 F8-Help
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             RCRIS: Notification View Screen 4A of 6
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 EPA Id: WVD082243502
                    Other Id:
                                       Source:
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                                      State Req
                                                State Reg
  Waste
            Type
                                                  Desc
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                    Status
                              Desc
 Activity:
* HW Generator
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the state of the s

\* HW TSD

\* HW Transporter

\* Mode of

\* Transportation: Air Rail Highway

\* Other

\* HW Burner/Blender

\* NHW Used Oil Recycler

**\$EPA** 

Recycler:

Underground Injection Control:

# ACKNOWLEDGEMENT OF NOTIFICATION OF REGULATED WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

<sup>+</sup>RVD082243502

07/23/97

Water

EH : }

JOHNS MANVILLE CORP PO BOX 5130 VIENNA, WV 261055130 RICHARD QUARANTA SR ENVIRON

INSTALLATION ADDRESS

2905 3RD AVE VIENNA , WV 261055130

EPA Form 8700-12A (6-90)



## ACKNOWLEDGEMENT OF NOTIFICATION OF REGULATED WASTE ACTIVITY

(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

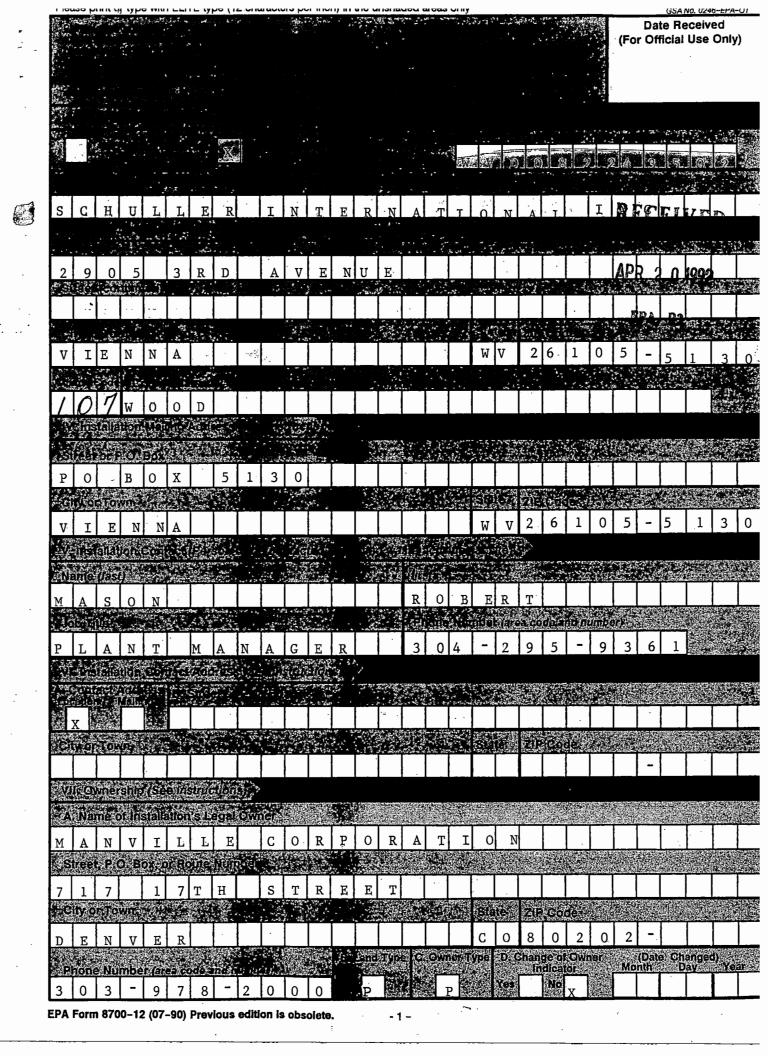
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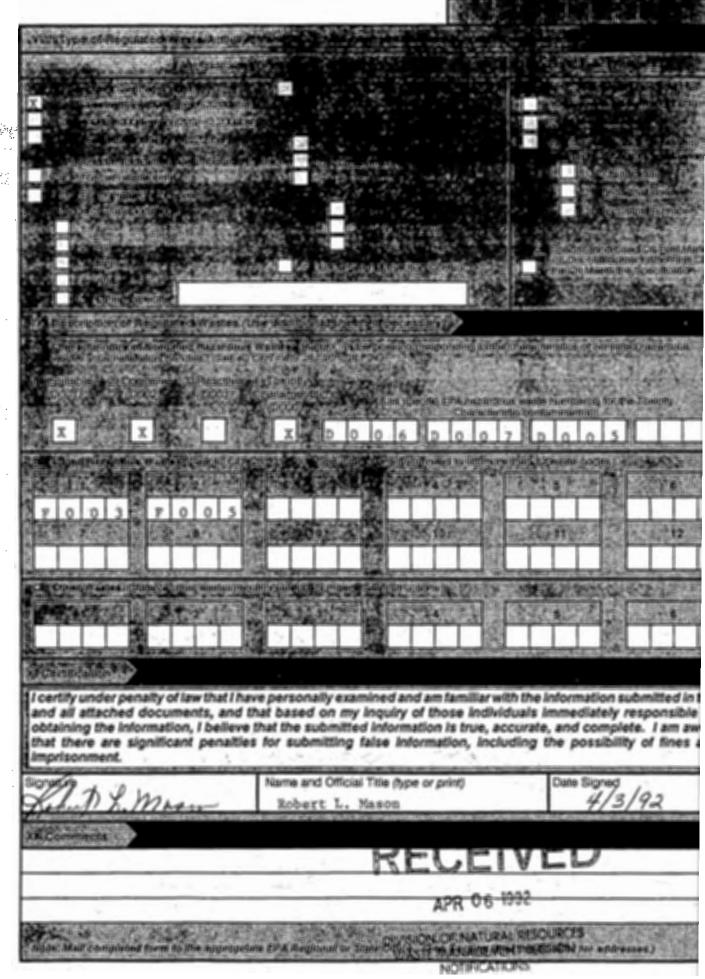
WVD082243502 SCHULLER INTERNATIONAL INC 2905 3RD AVENUE VIENNA , WV 26105 ROBERT MASON PLANT ENG

INSTALLATION ADDRESS

2905 3RD AVENUE VIENNA ,WV 26105

EPA Form 8700-12B (6-90)







#### STATE OF WEST VIRGINIA DEPARTMENT OF COMMERCE, LABOR AND ENVIRONMENTAL RESOURCES WASTE MANAGEMENT SECTION

1356 Hansford Street Charleston, West Virginia 25301 Telephone (304)348-5929 December 17, 1990

J. EDWARD HAMRICK II Director

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Manville Sales Corporation P.O. Box 5130 Vienna, West Virginia 26105-0130

ATTN: Christine Burkett, Environmental Specialist

Dear Ms. Burkett:

**GASTON CAPERTON** 

Governor

Enclosed is a copy of the Compliance Evaluation Inspection" (CEI) Report completed on your facility by representatives of the Chief of the Waste Management Section. This report is based on the inspection conducted on December 6, 1990.

Accompanying this report you will find a Notice of Violation (NOV) for those violations detected during the course of this inspection. The Enforcement Office of this Section and the United States Environmental Protection Agency have been notified so that these violations have become a permanent addition to the compliance history of this facility.

Thank you for your assistance and cooperation during this If you have any questions concerning the inspection or the attached report, please feel free to contact this office at (304) 348-5989.

Sincerely.

H. Michael Dorse Assistant Chief Compliance Monitoring and Enforcement Office

HMD/kw Enclosures

cc: denemarie Newton; U.S. MPA Region III Administrative Enforcement Dale Gable, Inspector Subash Puri, Permitting Section File

#### INSPECTION FACT SHEET

COMPANY NAME: I. D. #: WVD082243502 Manville Sales Corporation MAILING ADDRESS: P. O. Box 5130 TYPE OF FACILITY: Generator Vienna, WV 26105-0130 LOCATION: 2905 Third Avenue COUNTY: Wood Vienna, WV COMPANY CONTACT: Christine Burkett -HANDLING CODES: Environmental Specialist PHONE: (304) 295-9361 PURPOSE: Compliance Evaluation Inspection APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act, Chapter 20-5E; West Virginia Administrative Regulations for Chapter 20-5E; and/or 40 CFR §265. LIST OF CHEMICALS: (For Small Quantity Generators, list amount of waste, how it is handled; where it goes) Waste petroleum naptha D001 Waste paint related materials. F003/F005 EP dust, Spent chrome brick, Stack drain material, D007 Offtake material. Waste barium carbonate. D005 DATE INSPECTED: December 6, 1990 X VIOLATIONS INSPECTORS: (1) Dale Gable NO VIOLATIONS (2) Kevin Campbell (3) DATE PREPARED: December 6, 1990

Dale Gable

PREPARED BY:

#### Inspection Report

SUBJECT: Compliance Evaluation Inspection of

Manville Sales Corporation of Vienna, WV

DATE INSPECTED: December 6, 1990

INSPECTED BY: Dale Gable, WV DNR/WMS

Kevin Campbell, WV DNR/WMS

DATE PREPARED: December 6, 1990

PREPARED BY: Dale Gable

On December 6, 1990, this inspector and Kevin Campbell, Inspector, conducted a Compliance Evaluation Inspection of Manville Sales Corporation of Vienna, WV. Upon our arrival at 9:52 a.m., for this unannounced inspection, we were met by Ms. Christine Burkett, Environmental Specialist and later by Mr. Bob Mason, Plant Manager and Mr. Steve Meyer, Plant Engineer.

Upon presentation of appropriate credentials, I advised the representatives of our authority as representatives of the Chief of the Waste Management Section pursuant to Chapter 20 of the Code of West Virginia and as specified in Section 3007(a) of the Resource Conservation and Recovery Act. The representatives were informed that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chapter 20, Article 5E) and the regulations promulgated thereunder.

Manville Sales Corporation of Vienna, WV manufactures glass marbles that are subsequently utilized in the production of fiberglass insulation. The hazardous wastes which are generated by the facility include the following:

- 1.) Electrostatic Precipitator (EP) dust, Furnace Stack Drain Material,
  Offtake Material (All D007) 53,615 Kg generated in 1990 thus far.
  - 2.) Spent Chrome Brick (D007) 120,185 Kg generated in 1990.
  - Waste barium carbonate (D005) 22.6 Kg/Mo.

Compliance Evaluation Inspection of Manville Sales Corporation of Vienna, WV December 6, 1990
Page Two

- 4.) Waste paint related material (F003/F005) 30 Kg/Month.
- 5.) Waste petroleum naptha (DOO1) 6441 Kg generated in 1990 536.75 Kg/Month.

The DOO7 - chrome containing wastes (1 & 2 above) are all generated as a result of the use or contact with chrome containing refractory brick used in the glass furnaces. However, in September and October of 1990, all chrome containing refractory brick was removed from the glass furnaces and replaced with a non-chrome refractory brick. According to Ms. Burkett, when enough EP dust and stack drain material are accumulated for samples to be taken, a complete RCRA metals analysis for EP Toxicity and TCLP will be run. The frequency of future sampling will depend on the initial sample results. If EP Toxicity and TCLP limits for the RCRA metals are not exceeded, the facility will have successfully deleted the DOO7 waste stream.

The waste barium carbonate (DOO5) is generated from spills of the material during special batch operations. Waste paint related material (FOO3, FOO5), including spent solvents and waste paint, is generated in the facility paint shop. Waste petroleum naptha (DOO1) is generated in Safety-Kleen basins throughout the facility.

Following a brief initial meeting with the facility representatives, we began the physical inspection of the facility. In the two areas which EP dust is stored, the hazardous waste storage containers were found to be in good condition, labeled and dated properly. Inspection logs for the hazardous waste storage areas were found to be in order.

In the paint room, one container of F003, F005, waste paint related materials, was stored open. The container was labeled as "Hazardous Waste."

Compliance Evaluation Inspection of Manville Sales Corporation of Vienna, WV December 6, 1990
Page Three

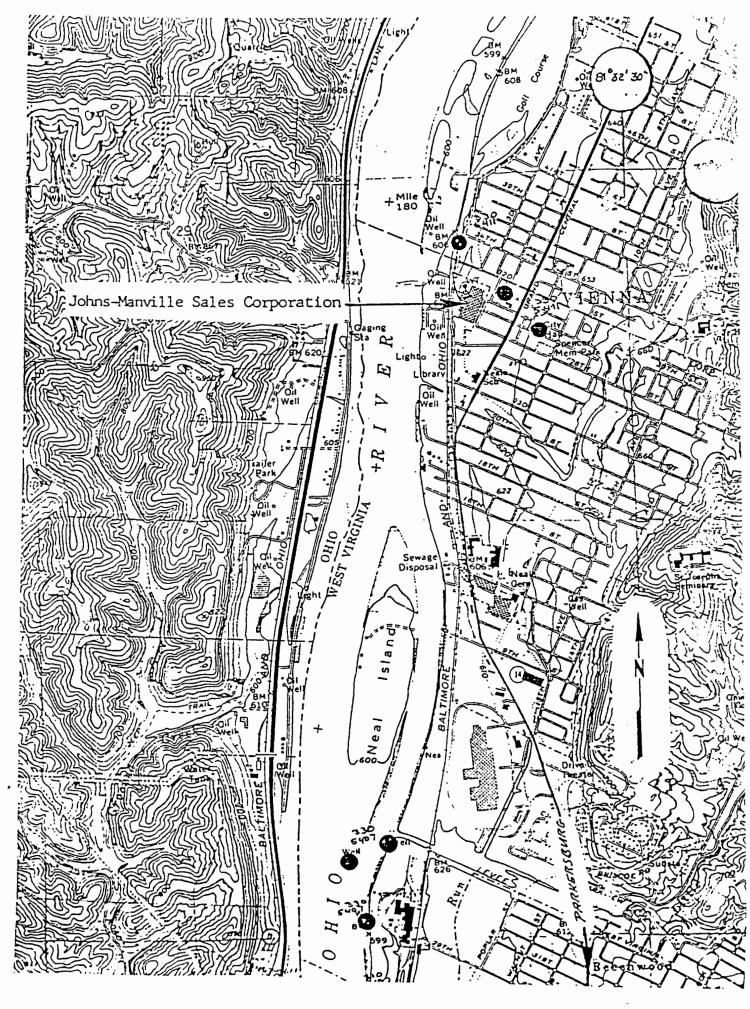
In the Electrostatic Precipitator (EP) dust accumulation area, three (3) 55-gallon drums of EP dust contaminated sandblasting agent and one (1) 55-gallon drum of EP dust contaminated clothing were stored without an accumulation start date. The containers were labeled as "Hazardous Waste" and were in good condition.

Following the physical inspection of the facility, we returned to Ms. Burkett's office where hazardous waste shipping manifests, the facility emergency contingency plan and the 1989 Annual Hazardous Waste report were all examined and found to be complete and in order. We then informed Ms. Burkett, Mr. Mason and Mr. Meyer of all violaton conditions found during the inspection in a brief meeting. After the meeting we thanked the facility representatives for their cooperation and departed the facility at 11:11 a.m.

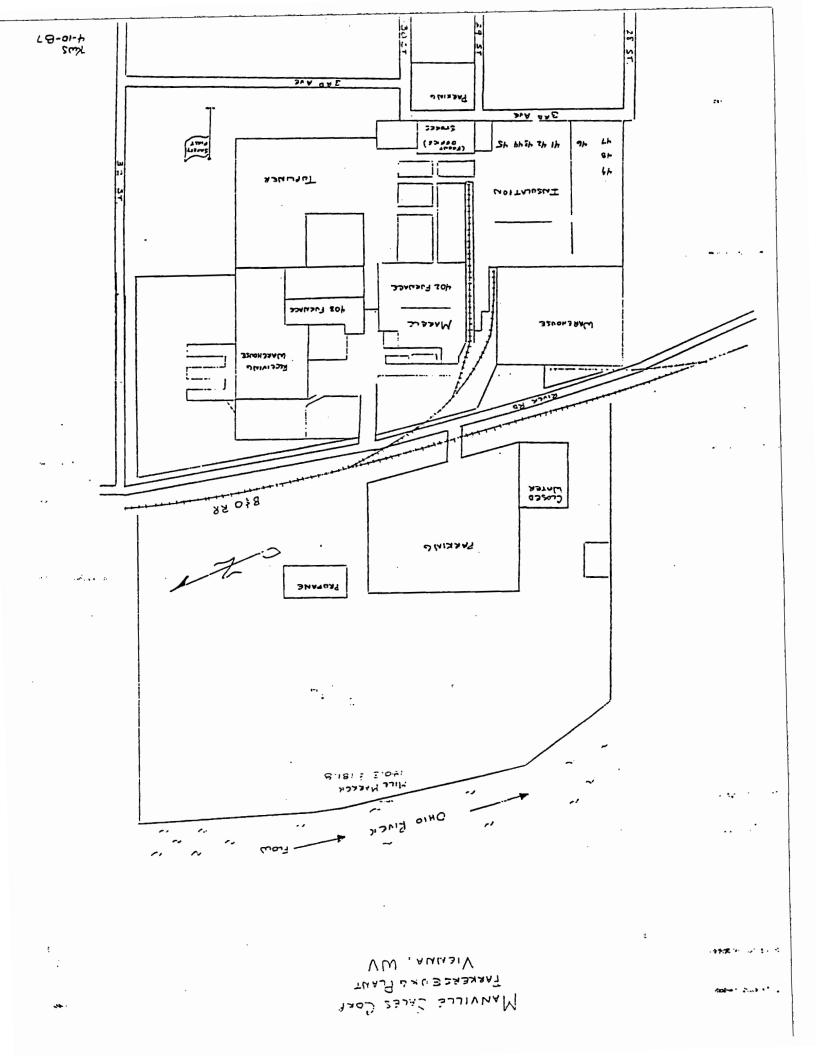
Compliance Evaluation Inspection of Manville Sales Corporation of Vienna, WV December 6, 1990 Page Four

#### Compliance Evaluation

Refer to "Notice of Violation" in the attachments of this report.  $\label{eq:DG/slm} \mbox{DG/slm}$ 



PARKERSBURG, W. VA. - OHIO



# Waste Management Section 6321 EMERSON AVE. PARKERSBURG, WV 26101 NOTICE OF VIOLATION

Date: 12-7-90	Time: <u>093/</u>
Issued to: Manville Sales Corporation	n
EPA I.D.#: WVD08 2243502	
Facility Mailing Address: P.O. Box 5130	
Vienna, WV 2610	
Facility Representative: Christine Burkett, &	nvironmental specialist
On the date and time specified, an authorize Waste Management Section conducted an inspection of in accordance with West Virginia Code, Chapter 20, A Permit issued pursuant to §20-5E. During that inspectively detected:  1. A. (Regulation) 40 CFR & 265.173 (a) as he	of the facility described above Article 5E and/or an Order or ction the following violation(s)
B. (Facts) The facility has stored hazar	II A A A A A A A A A A A A A A A A A A
2. A. 6.3.5. a. 2 of the WVHWMR's	
B. Thodate upon which each period of a	councilation begins is not
clearly marked on each hazardou	
3. A.	
B	
4. A.	
In order to attain compliance with the cited must perform the following remedial actions:	
1. Somme diately close all containers holding	og Mazardous Waste unless
it is necessary to add or nemove wasto	0 + +
2. Ammediately mark or label each ha	A
3. Notify Dalo Hable Aussector in a	
the receipt of this notice of all reme	1.0 11 11
4.	
A copy of this <b>Notice of Violation</b> will be f Office of the Waste Management Section. The issuar in an administrative civil penalty being levied in a Code §20-5E-16(a).	nce of this Notice may result
IMMR's = West Virginia Hazardous Issued By:	Vale Dable
IWMR's = West Virginia Hazardous Issued By:  Wasto Management Title: Envir	ronmental Inspector

MVL Manville John MANVIlle Sales Corp

January 18, 1990

H. Michael Dorsey
Acting Section Leader Compliance Monitoring Section
West Virginia Department of Natural Resources
Division of Waste Management
1260 Greenbrier Street
Charleston. WV 25311

Dear Mr. Dorsey:

In response to the compliance evaluation inspection report dated December 28, 1989, this facility would like to inform you of the actions taken to address the item of noncompliance sited during that inspection.

The item sited during the inspection was an open bin that contained approximately 50 pounds of stack drain. The bin also contained batch dust and floor sweepings. The material was drummed and labeled as hazardous waste and moved to the proper storage area on December 7, 1989, immediately following the inspection. The following actions have been taken to insure that the noted problem does not reoccur.

Reestablished the procedure for handling stack drain. (See attached)

In addition to the current hazardous waste inspection performed daily by the supervisors, weekly unannounced audits of the hazardous waste storage areas will be held and reports issued. These audits will be held by the environmental specialist and the plant superintendent.

Hoppers will be modified and designed especially for the stack drain material.

All regulations will be followed.

ristené L. Burkett

If after reviewing this response you have any questions or concerns, please feel free to contact me at 304-295-9361.

Sincerely.

Christine L. Burkett

Environmental Specialist

/nk

cc: : Doug Donos, 1824 (256) 1891

Date Cable, Inspector Bob Mason, Plant Manager

Rich Johanson-R-17

WAN 23 1990

#### SUPERVISORS NOTICE

The cullet tubs being used for stack drain by hot repairman on 402 <u>must</u> be covered before they go to 22 building. When a tub is full, cover with one of the black plastic bags in batch house and put a hazardous waste label on top of cover. If tub has hot stack drain in it let cool before covering, but must be covered and put in 22 building within 8 hours after removing from stack area.

Record date, time and shift removed from stack area, also date, time and shift tub is covered if done on next shift.



### STATE OF WEST VIRGINIA DEPARTMENT OF NATURAL RESOURCES DIVISION OF WASTE MANAGEMENT

GASTON CAPERTON
Governor

1260 Greenbrier Street Charleston, West Virginia 25311

December 28, 1989

J. EDWARD HAMRICK III
Director

LARRY W. GEORGE Deputy Director

Ms. Christine Burkett
Manville Sales Corporation
P. O. Box 5130
Vienna, West Virginia 26105-0130

Dear Ms. Burkett:

Enclosed is a copy of the "Compliance Evaluation Inspection" (CEI) Report completed on your facility by representatives of the Chief of the Division of Waste Management. This report is based on the inspection conducted on December 7, 1989.

Please refer to the "Compliance Evaluation" section of the report for those violations discovered during the course of this inspection.

A copy of this report has been referred to the Enforcement Section of this Division for further action, and also, a copy is being transmitted to the United States Environmental Protection Agency (U. S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or attached report, please feel free to contact this office at 304/348-5935.

H. Michael Dorsey
Acting Section Leader

Compliance Monitoring Section

HMD/pgd Enclosure

cc: Doug Donor, EPA, Region III

Enforcement Section
Dale Gable, Inspector

JAN 25 1990

#### INSPECTION FACT SHEET

I. D. #: WVD082243502 COMPANY NAME: Manville Sales Corp. MAILING ADDRESS: P. O. Box 5130 TYPE OF FACILITY: Generator Vienna, WV 26105-0130 LOCATION: COUNTY: 2905 Third Avenue Wood Vienna, WV 26105 COMPANY CONTACT: S01 Christine Burkett HANDLING CODES: Environmental Specialist PHONE: (304) 295-9361 PURPOSE: Compliance Evaluation Inspection APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act, Chapter 20-5E; West Virginia Administrative Regulations for Chapter 20-5E; and/or 40 CFR §265. LIST OF CHEMICALS: (For Small Quantity Generators, list amount of waste, how it is handled; where it goes) D001 D007 F003 F005 December 7, 1989 **VIOLATIONS** DATE INSPECTED: Dale Gable, WV DNR/DWM INSPECTORS: NO VIOLATIONS (1)

Kevin Campbell, WV DNR/DWM

DATE PREPARED: December 8, 1989

(2)

(3)

PREPARED BY: Dale Gable

#### INSPECTION REPORT

SUBJECT: Compliance Evaluation Inspection of

Manville Sales Corporation of Vienna, WV

DATE INSPECTED: December 7, 1989

INSPECTED BY: Dale Gable, WV DNR/DWM

Kevin Campbell, WV DNR/DWM

DATE PREPARED: December 8, 1989

PREPARED BY: Dale Gable

On December 7, 1989, this inspector, and Kevin Campbell,
Inspector, conducted a Compliance Evaluation Inspection (CEI) of
Manville Sales Corp. of Vienna, WV. Upon our arrival at 9:45 a.m.,
for this unannounced inspection, we were met by Ms. Christine
Burkett, Environmental Specialist.

Upon presentation of appropriate credentials, we advised the Ms. Burkett of our authority as representatives of the Chief of the Division of Waste Management pursuant to Chapter 20 of the Code of West Virginia and as specified in Section 3007(a) of the Resource Conservation and Recovery Act. Ms. Burkett was informed that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chapter 20, Article 5E) and the regulations promulgated thereunder.

Manville Sales Corp., of Vienna, WV is a facility which manufactures glass marbles that are utilized in the production of fiberglass insulation. The hazardous wastes which are generated by the facility include the following:

- 1) Electrostatic Precipitator (EP) dust; Furnace Stack Drain material; Spent Chrome brick (D007).
  - 2) Waste Paint related material (F003, F005).
  - 3) Waste Petroleum Naptha (D001).

Compliance Evaluation Inspection - Manville Sales Corporation of Vienna December 8, 1989
Page Two

Chrome-containing wastes are produced as a result of the use of or contact with chrome refractory brick in the glass furnaces. Waste paint related materials are generated in the facility paint shop. The waste petroleum naptha is generated through parts cleaning operations in Safety-Kleen basins throughout the facility. The total amount of hazardous wastes generated by the facility exceeds 1,000 kg/month, placing Manville Sales in the Generator classification.

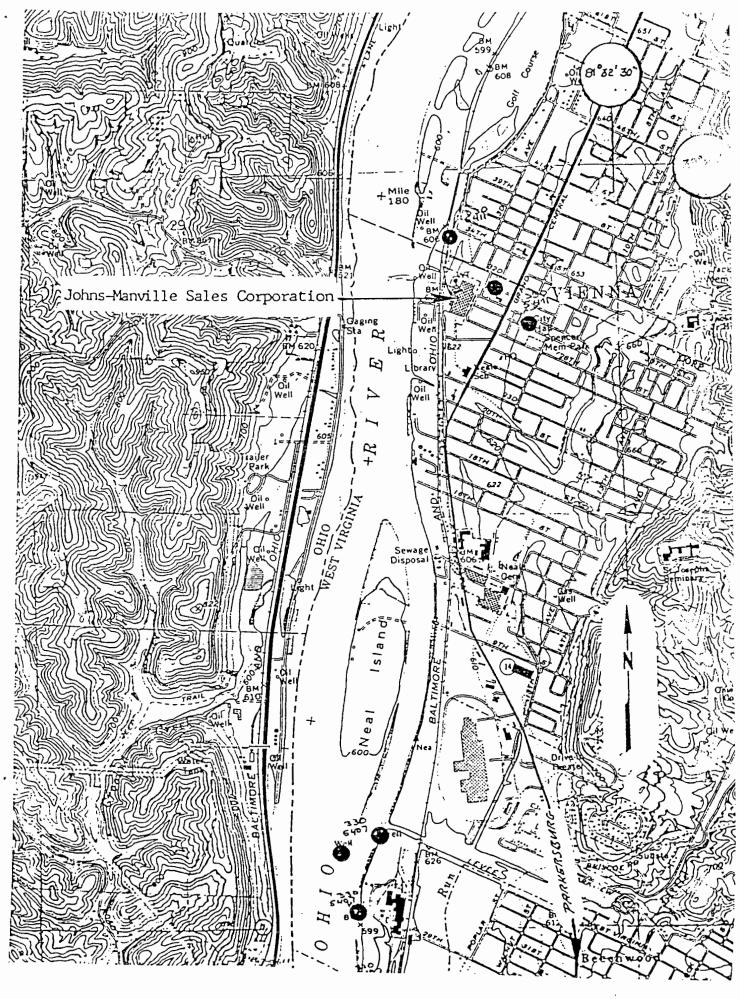
During the office portion of the inspection, hazardous waste shipping manifests, training logs, contingency plans and inspection logs were examined and found to be in order.

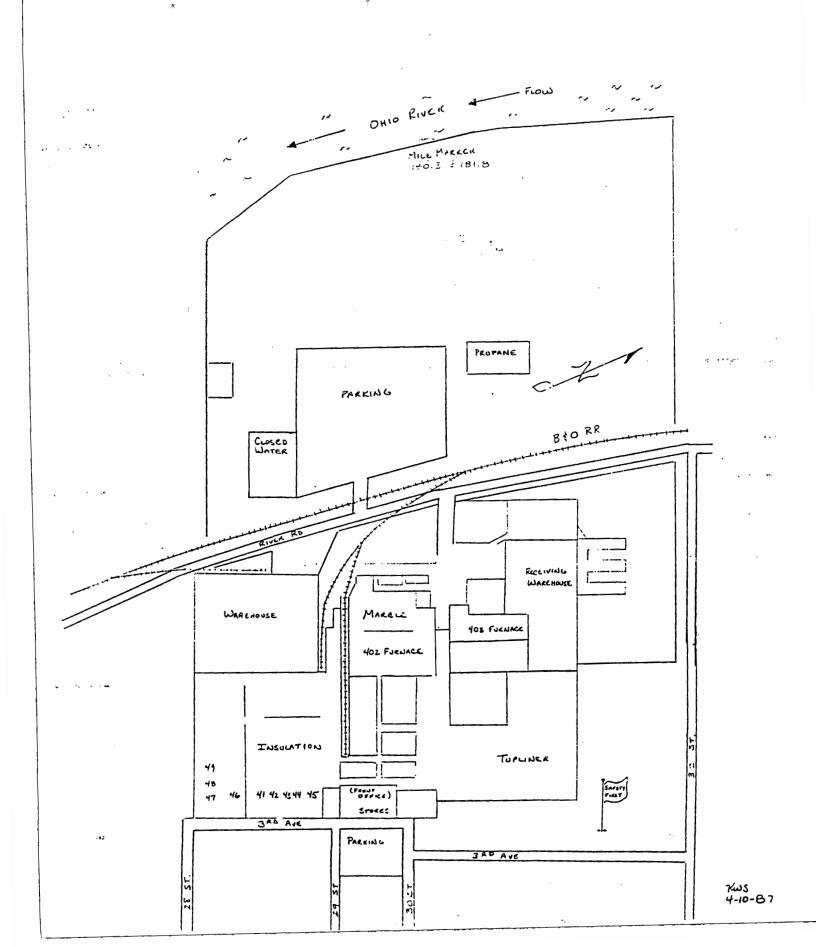
Following the paperwork examination, we proceeded to the hazardous waste drum storage area. All containers were in good condition, labeled as "Hazardous Waste," stored for under 90 days and marked with an accumulation start date. While enroute to the satellite accumulation area for stack drain material (D007), we discovered one open bin of stack drain material, batch dust and trash stored in building 22. The open bin was neither labeled as "Hazardous Waste," nor was it marked with an accumulation date. Ms. Burkett indicated that she would immediately have the material drummed up, labeled properly and placed in the hazardous waste drum storage area. No other areas of violation were noted during the physical inspection. After a brief meeting in Ms. Burkett's office, we thanked her for her cooperation and assistance, then departed the facility at 10:57 a.m.

Compliance Evaluation Inspection - Manville Sales Corporation of Vienna December 8, 1989
Page Three

#### Compliance Evaluation

- 1. The facility has not labeled each container holding hazardous waste with the words "Hazardous Waste" in violation of Section 6.3.5.a.4. of the West Virginia Hazardous Waste Management Regulations (hereinafter the "Regulations").
- 2. The date upon which each period of accumulation begins is not marked on each container, in violation of Section 6.3.5.a.2. of the Regulations.
- 3. All containers holding hazardous waste are not kept closed during storage, in violation of 40 CFR 265.173 a, as referenced by Section 6.3.5.a.1. of the Regulations.





THE STATE OF THE S

WV1/006243502

### STATE OF WEST VIRGINIA DEPARTMENT OF NATURAL RESOURCES DIVISION OF WASTE MANAGEMENT 1260 Greenbrier Street

Charleston, West Virginia 25311

ARCH A. MOORE, JR. Governor

RONALD R. POTESTA Director

ROBERT K. PARSONS Deputy Director

JOHN-MANUILE

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 26, 1988

Mr. Kevin W. Sprague Manville Sales Corporation P. O. Box 5130 Vienna, West Virginia 26105-0130

Dear Mr. Sprague:

Enclosed is a copy of the "Compliance Evaluation Inspection" (CEI) Report completed on your facility by representatives of the Chief of the Division of Waste Management. This report is based on the inspection conducted on June 28, 1988.

In this report, please refer to the "Compliance Evaluation" section for those violations detected during the course of this inspection and "Notice of Non-Compliance" for the actions taken by the Enforcement Unit of this Division.

An additional copy of this report and "Notice of Non-Compliance" will be transmitted to the United States Environmental Protection Agency (U. S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or attached report, please feel free to contact this office at 304/348-5929.

MANA BOMPLIANCE SCATIONA

ECEIVED

AUG 17 1988

Sincerely,

DIVISION OF WASTE MANAGEMENT

Ava C. Zeitz

Compliance Monitoring and Enforcement Section Leader

ACZ/pd Enclosure

cc: Doug Donor, EPA, Region III
John Meeks, Enforcement Unit
Dale Gable, Inspector

#### NOTICE OF NON-COMPLIANCE

Manville Sales Corporation Vienna, WV WVD082243502

On June 28, 1988 authorized representatives of the Chief of the Division of Waste Management conducted a Compliance Evaluation Inspection at your Vienna, West Virginia facility. During the inspection the following items of non-compliance were noted:

- 1. The facility does not presently maintain a written description of the type and amount of introductory and continuing training for personnel that are involved with hazardous waste management, in violation of 40 C.F.R. § 265.16(d)(3) as referenced by Section 6.3.5.a.5 of the West Virginia Hazardous Waste Management Regulations (hereinafter the "Regulations").
- 2. The facility has failed to perform a hazardous waste determination on all wastes, in violation of Section 6.1.1 of the Regulations.
- 3. The facility does not have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies in violation of 40 C.F.R. § 265.35 as referenced by Section 6.3.5.a.5 of the Regulations.
- 4. The facility has not submitted a copy of their contingency plan to local police, fire departments, hospitals and emergency response teams, in violation of 40 C.F.R. § 265.53 as referenced by Section 6.3.5.a.5 of the Regulations.

This will serve as a **Notice of Non-Compliance** of the provisions of Chapter 20, and Article 5E of the Code of West Virginia. In order to achieve compliance in the areas where the violations were observed, Manville Sales Corporation must perform the following remedial actions:

- 1. Upon receipt of this letter, ensure that adequate aisle space exists to allow unobstructed movement in an emergency.
- 2. Within 30 days of receipt of this letter:
  - establish and maintain written description of type and amount of introductory and continuing training for personnel involved in hazardous waste management;

- b. submit copies of the facility's contingency plan to the appropriate local agencies;
- c. complete hazardous waste determinations for all wastes at the facility.
- 3. Within 45 days of receipt of this letter, provide written documentation to this office of the above remedial actions, including results of the waste determinations.

If you have any questions concerning this matter, please contact Mr. John Meeks of the Enforcement Unit at 304/348-2745.

#### INSPECTION FACT SHEET

COMPANY NAME: Manville Sales Corporation

I. D. #: WVD082243502

MAILING ADDRESS:

P. 0. Box 5130 2905 3rd Avenue

TYPE OF FACILITY: Generator

LOCATION:

Vienna, WV 26105-0130

COUNTY: Wood

COMPANY CONTACT:

Kevin W. Sprague

HANDLING CODES: \$01

PHONE:

(304) 295-9361

**PURPOSE:** 

Compliance Evaluation Inspection

APPLICABLE REGULATIONS:

West Virginia Hazardous Waste Management Act, Chapter 20-5E; West Virginia Administrative Regulations for Chapter 20-5E; and/or 40 CFR 265.

#### LIST OF CHEMICALS:

(For Small Quantity Generators, list amount of waste, how it is handled; where it goes) where it goes) where it goes) where it goes) where it goes) where it goes) where it goes) where it goes) where it goes) where it goes wher

\*Trace amounts in D007 waste

DATE INSPECTED:

June 28, 1988

INSPECTORS:

- (1) Dale Gable, DNR/DWM
- (2) Kevin Campbell, DNR/DWM

(3)

DATE PREPARED:

June 30, 1988

PREPARED BY:

Dale Gable

#### INSPECTION REPORT

**SUBJECT:** Compliance Evaluation Inspection (CEI) -

Manville Sales Corporation (WVD082243502), Vienna, WV

INSPECTORS:
Dale Gable, WV DNR/DWM

Kevin Campbell, WV DNR/DWM

DATE INSPECTED: June 28, 1988

DATE PREPARED: June 30, 1988

PREPARED BY: Dale Gable

On June 28, 1988, this inspector and Kevin Campbell, Inspector, WV DNR/DWM, conducted a Compliance Evaluation Inspection of Manville Sales Corporation. Upon our arrival at 9:23 a.m., for this unannounced inspection, we were met by Kevin W. Sprague, Environmental Coordinator.

Upon presentation of appropriate credentials, we advised the official of our authority as representatives of the Chief of the Division of Waste Management pursuant to Chapter 20 of the Code of West Virginia and as specified in Section 3007(a of the Resource Conservation and Recovery Act. The facility representative was informed that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chapter 20, Article 5E) and the regulations promulgate thereunder.

The Manville Sales Corporation, Vienna, WV, is a facility dedicated to the production of glass marbles which are melted to produce fiberglass insulation material. The hazardous wastes which are generated at the facility include:

- D001; Waste Petroleum Naptha
- F003, F005; Waste Paint Related Material containing Acetone, MEK, MIBK,
  Tolulene and Xylene
- D007; Electrostatic Precipitator Dust, Furnace Stack Drain Material, Furnace Chromium Brick
- D006 & D010; Trace amounts of Cadmium and Selenium in D007 waste

The waste petroleum naptha is generated through parts cleaning operations in Safety-Kleen basins throughout the facility. All of the chrome containing wastes

are produced as a result of the use of chrome refractory brick in the glass furnaces which imparts an E.P. toxic character to the Electrostatic Precipitator dust and the furnace stack drain material. A large percentage of this material is recycled by being fed back into the furnaces and remelted for glass recovery. Also, periodically, the glass furnaces are rebuilt to install new refractory bricks. The old chrome bricks are currently disposed of as an E.P. toxic hazardous waste. office portion of the inspection, the checklists for Generators and Use and Management of Containers were completed. The facility is currently in the process of developing a RCRA training program for employees. According to Kevin Sprague, employees involved directly with hazardous waste are given on-the-job training in hazardous waste management procedures. The Contingency Plan, while in place, has not been submitted, formally, to local police, fire departments and hospitals; however Mn: Sprague has spoken to these authorities informally and will submit copies of the plan to them in the near future. The RCRA training program, nearly complete series will be given to employees in a formal classroom setting. To date, employees have arms not had documented hazardous waste management training. NOTE: According to Mr. Sprague, Manville Sales Corporation had been operating, suppuntily a fewemonths cago, on the on the assumption that through recycling efforts, they would become a Small Quantity Generator and thus avoid the Generator requirements. Since Generator status is now a certainty, Manville and Mr. Sprague are making a good effort to insure compliance.

Also during the office interview with Mr. Sprague, he voluntarily informed us of approximately seventy (70) drums of unknown material which have been stored in the facility warehouse. Most of these drums are believed to be waste oil but several may contain used solvents. Mr. Sprague has been in contact with the Inland Waters Company of Michigan - MID000820365, who will be sampling these unknown drums. We advised Mr. Sprague that these determinations should be made as quickly as possible and he agreed.

Manville Sales Corporation (WVD082243502), Vienna, WV June 30, 1988 Page Three

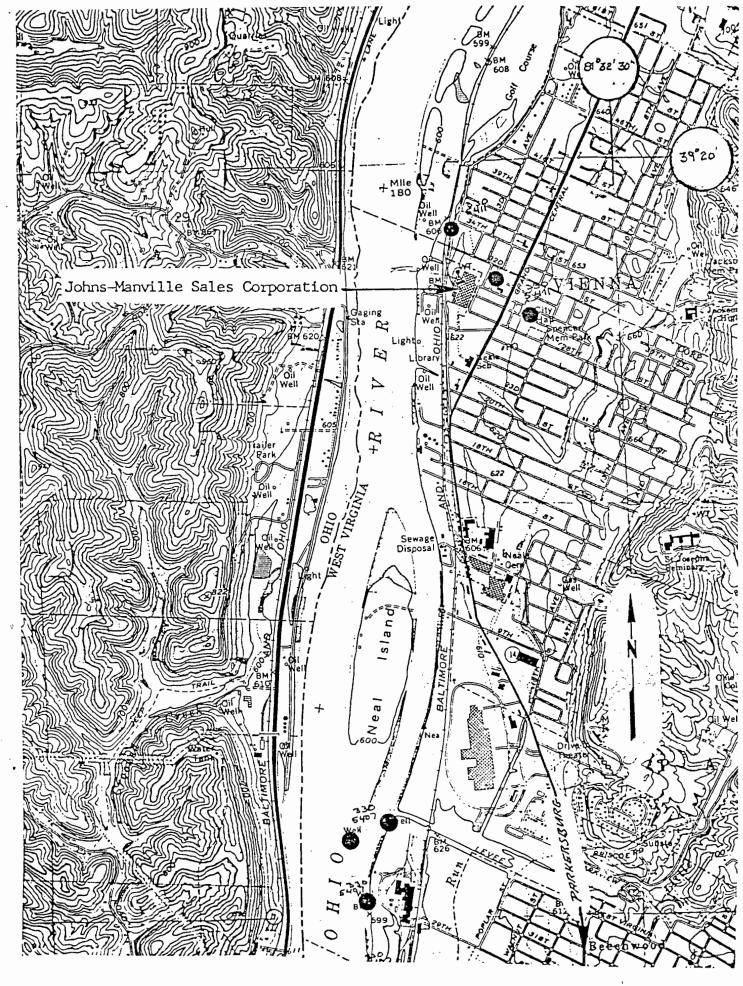
Shipping manifests were inspected and found to be satisfactory. See attachment "C" for example manifests for each waste stream and/or transporter and disposal company.

Following the completion of the office portion of our inspection, a facility tour and inspection was conducted. In the hazardous waste drum storage area, it was noted that there was not adequate aisle space between rows of drums. Mr. Sprague said that this problem would be corrected immediately. We then inspected the area of the warehouse in which the drums of unknowns are stored. These drums have been in storage for well over the 90-day limit for hazardous waste, but no determinations have been made as to their content. These determinations will be made shortly as mentioned earlier in this report.

At this time, we concluded the inspection, thanked Mr. Sprague for his cooperati and assistance, then departed the facility at 12:30 p.m.

#### Compliance Evaluation

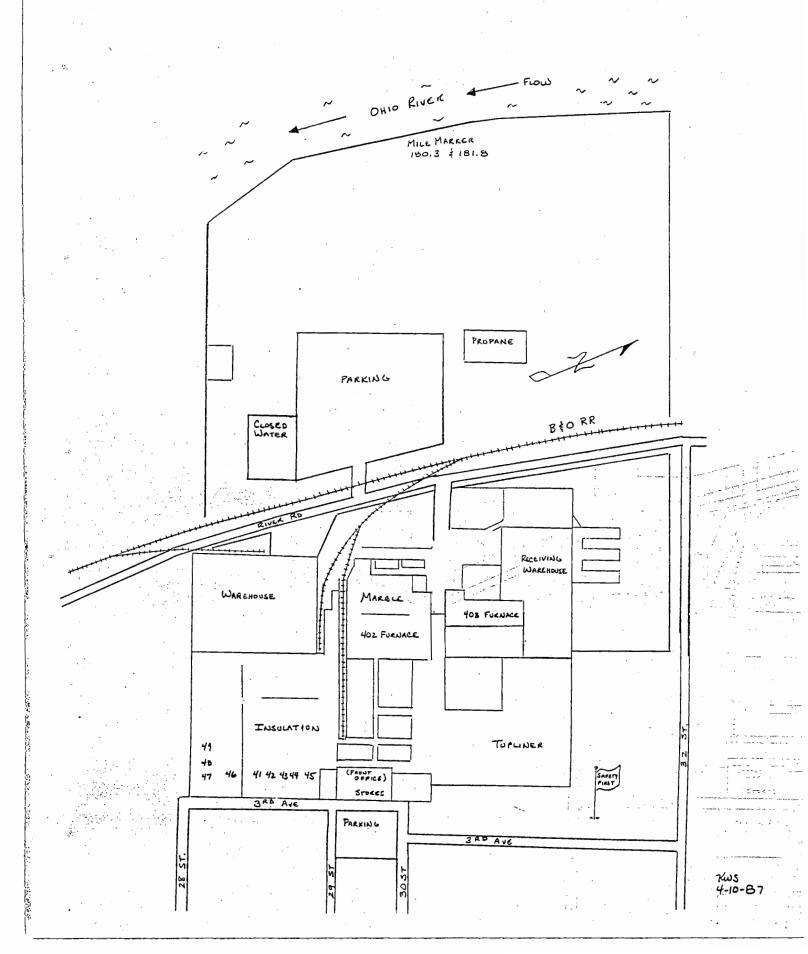
- 1. The facility does not presently maintain a written description of the type and amount of introductory and continuing training for personnel that are involved with hazardous waste management in violation of 40 CFR § 265.16 (d)(3) as referenced by Section 6.3.5.a.5 of the West Virginia Hazardous Waste Management Regulations (hereinafter the "Regulations").
- The facility has failed to perform a hazardous waste determination on all wastes in violation of Section 6.1.1 of the Regulations.
- 3. The facility does not have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies in violation of 40 CFR § 265.35 as referenced by Section 6.3.5.a.5 of the Regulations.
- The facility has not submitted a copy of their Contingency Plan to local police, fire departments, hospitals and emergency response teams in violation of 40 CFR § 265.53 as referenced by Section 6.3.5.a.5.ofFthe Regulations.

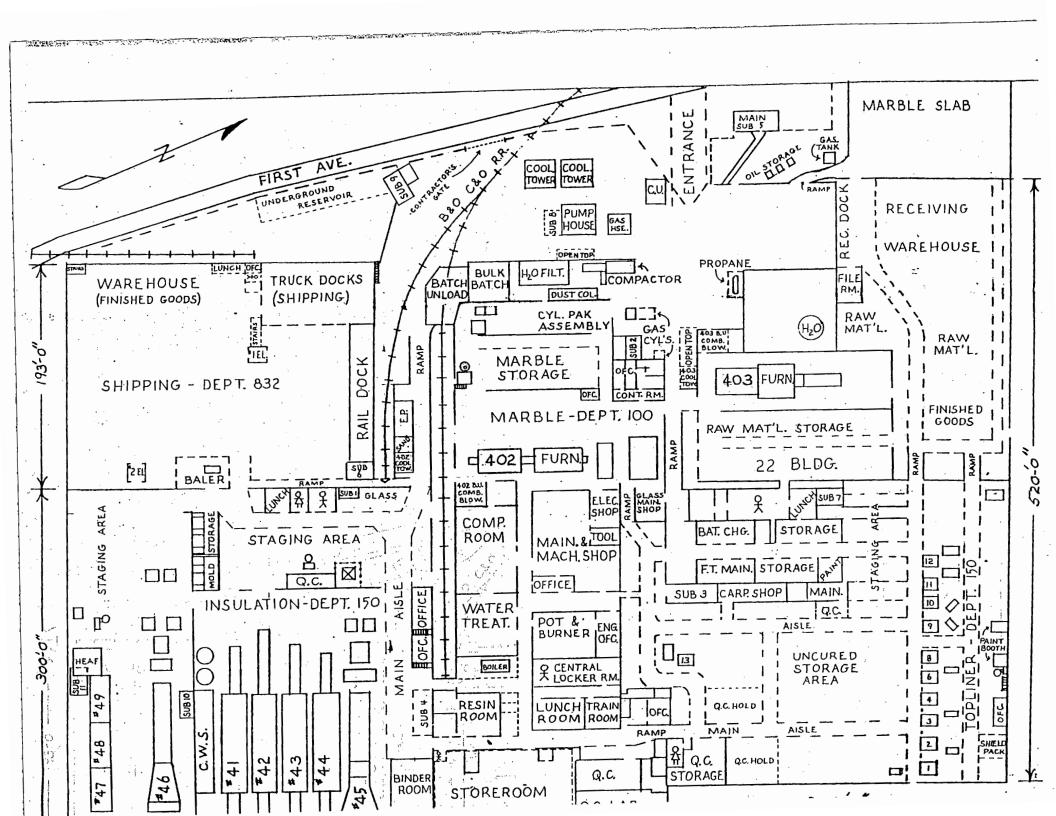


PARKERSBURG, W. VA. - OHIO

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MANVILLE SALES CORP PARKERSEURG PLANT VIENNA, WV





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E. Transporter's Phone										
9. Designated Facility Name and Site Address 10. US EPA ID Number G State Facility's ID										
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19. Discrepancy Indication Space										
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20. Facility Owner or Operator: Ce	ertification of receipt of hazar	dous materials	covered by this	s manifest	except as n	oted in Item	19.		Date	
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ţ	20.	Facility Owner or Operator: Certification of receipt of hazard			manifest	except a	s noted in Item		Date		
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Section 3002(b) of RCRA, I also certify that economically practicable and I have selected human health and the environment.				
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19. Discrepancy Indication Space				
20. Facility Owner or Operator: Certification of r	eceipt of hazardous materials covered by thi	is manifest except as note	d Item 19	
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## MICHIGAN DEPARTMENT OF NATURAL RESOURCES Please print or type.

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WVP 0822432

STATE OF WEST VIRGINIA **DEPARTMENT OF NATURAL RESOURCES** 

DIVISION OF WASTE MANAGEMENT

1260 Greenbrier Street Charleston, West Virginia 25311 **RONALD R. POTESTA** Director

**ROBERT K. PARSONS Deputy Director** 

JOHNS-MANVIlle

December 6, 1988

Mr. Kevin W. Sprague Manville Sales Corporation P. O. Box 5130 Vienna, West Virginia 26105-0130

Dear Mr. Sprague:

ARCH A. MOORE, JR.

Governor

Enclosed is a copy of the "Compliance Evaluation Inspection" (CEI) Report completed on your facility by representatives of the Chief of the Division of Waste Management. This report is based on the inspection conducted on October 13, 1988.

Please refer to the "Compliance Evaluation" section of the report for those violations discovered during the course of this inspection.

A copy of this report will be referred to the Enforcement Unit of this Division with an additional copy transmitted to the United States Environmental Protection Agency (U. S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or attached report, please feel free to contact this office at 304/348-5929.

Sincerely,

Ava C. Zeitz

Enforcement Section Leader

RECEIVED

ACZ/pd Enclosure

cc: Doug Donor, EPA, Region III

John Meeks, Enforcement Unit DEC 28 1988

Dale Gable, Inspector

#### INSPECTION FACT SHEET

COMPANY NAME: Manville Sales Corporation

I. D. #: WVD082243502

MAILING ADDRESS: P. O. Box 5130

TYPE OF FACILITY: Generator

2905 3rd Avenue

Vienna, WV 26105-0130

LOCATION:

Vienna, WV 26105-0130

COUNTY: Wood

COMPANY CONTACT: Kevin W. Sprague,

Environmental Coordinator

HANDLING CODES: SO1

PHONE:

(304) 295-9361

PURPOSE:

Compliance Evaluation Inspection

APPLICABLE REGULATIONS:

West Virginia Hazardous Waste Management Act, Chapter 20-5E; West Virginia Administrative Regulations for Chapter 20-5E; and/or 40 CFR 265.

LIST OF CHEMICALS:

(For Small Quantity Generators, list amount of waste, how it is handled; where it goes)

D001, D006\*, D007, D010\*, F003, F005, D002

\*Trace amounts in D007 waste

DATE INSPECTED:

October 13, 1988

INSPECTORS:

(1) Dale Gable, WV DNR/DWM

(2) Kevin Campbell, WV DNR/DWM

(3)

DATE PREPARED:

October 14, 1988

PREPARED BY:

Dale Gable

#### INSPECTION REPORT

SUBJECT:

Compliance Evaluation Inspection of Manville Sales

Corporation, Vienna, WV 26101

**INSPECTORS:** 

Dale Gable, WV DNR/DWM

Kevin Campbell, WV DNR/DWM

DATE INSPECTED:

October 13, 1988

DATE PREPARED:

October 14, 1988

PREPARED BY:

Dale Gable

On October 13, 1988, this inspector and Kevin Campbell, Inspector WV DNR/DWM, conducted a Compliance Evaluation Inspection of Manville Sales Corporation, Vienna, WV. Upon our arrival at 2:40 p.m. for this unannounced inspection, we were met by Kevin Sprague, Environmental Coordinator.

Upon presentation of appropriate credentials, we advised the official of our authority as representatives of the Chief of the Division of Waste Management pursuant to Chapter 20 of the Code of West Virginia and as specified in Section 3007(a) of the Resource Conservation and Recovery Act. The facility representative was informed that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chatper 20, Article 5E) and the regulations promulgated thereunder.

The Manville Sales Corporation, Vienna, WV, is a facility which is dedicated to the production of glass marbles which are melted to produce fiberglass insulation materials. The hazardous wastes which are generated at the facility include:

-- D001: Waste Petroleum Naptha

-- F003, F005: Waste Paint Related Material containing Acetone, MEK, MIBK, Toluene and Xylene

-- DOO7: Electrostatic Precipitator (EP) dust, Furnace Stack Drain material and used Furnace Chromium Brick

-- D006, D010: Trace amounts of Cadmium and Selenium in D007 waste

The waste petroluem naptha is generated through parts cleaning operations in Safety-Kleen basins throughout the facility. All of the chrome-containing wastes are produced as a result of the use of chrome refactory brick in the glass

furnaces which imparts an E.P. toxic character to the EP dust and the furnace stack drain material. A large percentage of this material is recycled by being fed into the furnaces and remelted for glass recovery. Also, periodically, the glass furnaces are rebuilt in order to install new refactory bricks. The old chrome bricks are currently disposed of as an E.P. Toxic hazardous waste. The facility is seeking a firm which will recycle the used chrome brick.

The main purpose of this inspection was to follow-up the previous CEI of June 28, 1988 when certain violations were noted. The facility now maintains a written description of the type and amount of introductory and continuing training for personnel that are involved in hazardous waste management. The facility has now submitted a copy of their Contingency Plan to local police, fire departments and hospitals as evidenced by Certified Mail receipts. The hazardous waste determinations for the unknown drums mentioned in the June 28, 1988 inspection have been completed. (See attachment A) The Inland Waters Company of Brownstown Township, Michigan, a broker for Mansville Sales Corporation, contracted with Environmental Quality Laboratories of Sterling Heights, Michigan for the testing of the unknown drums.

The chemical analysis of the unknown drums indicates hazardous characteristics in approximately 40 of the drums. The Inland Waters Company is now seeking a proper disposal facility for the wastes. The remaining drums contained various used oils from the facility and will be accepted by Safety-Kleen Corporation for disposal or reclamation.

During the physical inspection of the facility, aisle space between rows of hazardous waste drums was found to be adequate, satisfying the previous violation condition. Recently tested unknown drums were numbered, but not yet labeled as "Hazardous waste". Mr. Sprague will label all hazardous waste containers immediately following complete examination of the laboratory analysis. Following a brief

factory tour and discussion with Mr. Sprague we then thanked him for his cooperation and assistance then departed the facility at 3:48 p.m.

#### Compliance Evaluation

- 1. The generator has accumulated hazardous wastes onsite for greater than 90 days, in violation of Section 6.3.5.a of the West Virginia Hazardous Waste Management Regulations (hereinafter the "Regulations").
- 2. The generator has not marked each hazardous waste container with the date of each period of accumulation in violation of Section 6.3.5.a.2 of the Regulations.
- 3. The generator has failed to label or mark each hazardous waste container with the words "Hazardous Waste" in violation of Section 6.3.5.a.4 of the Regulations.

#### Areas of Concern

1. The sampling methods of outside brokers or contract laboratories should be scrutinized more closely by the facility, as was discussed between this inspector and Mr. Sprague via a later telephone conversation.

DG/s1m

6540 Diplomat Drive Sterling Heights, Michigan 48078-7258 (313) 731-1818 Outside Michigan Dial 1-800-368-5227 Fax Line 313-731-2590

INLAND WATERS 24354 KING RD. BROWNSTOWN TWP., MI 48174

ATTN: JOEL DUELING

DATE REPORTED: 9-14-88 DATE RECEIVED: 9-7-88 LAB NO. 1113-A

DESCRIPTION AND SAMPLE NUMBER COMPOSITE OF 1
SAMPLE MATTRIX
REPORT OF ANALYSIS

	===:	=====	=====	=====	=====		========	
EXTRACTION PROCEDURE - LEACHEATE STANDARDS METHOD								
(all results	in ]	ppm or	mg/1	<u>.</u> ),		(ppm or mg	//1) SW 846-B	
ARSENIC	= .	*LESS	THAN	0.01		5.0	7061	
BARIUM	=	LESS	THAN	0.5		100.0	7080	
CADMIUM	=	LESS	THAN	0.5		1.0	7130	
CHROME, TOT.	=	LESS	THAN	0.5		5.0	7190	
COPPER	=	LESS	THAN	0.5		100.0	7210	
LEAD	=	LESS	THAN	0.5		5.0	7420	
MERCURY	=	LESS	THAN	0.01		0.2	7470	
SILVER	=	LESS	THAN	0.5		5.0	7760	
SELENIUM	==	LESS	THAN	0.01		1.0	7741	
ZINC	=	1.0				500.0	7950	
IGNITABILITY	=	.115 O	F				L40 DEGREE F	
						SEC. 2	1.1 1010	
CORROSIVITY (	pH)	= 1.6	65			less than o	or = to 2 or	
greater than or = 13. 1110								
REACTIVITY								
as Reactiv	as Reactive Cyanide =LESS THAN 1.0 mg/Kg 250 9010							
as Reactive Sulfide =LESS THAN 10.0 mg/Kg 500 9030								

\*NOTE: TERM LESS THAN DENOTES DETECTION LIMIT OF TEST.

THOMAS S. MEGNA, M.S., LAB DIRECTOR

REFERENCES: STANDARD METHODS FOR EXAMINATION OF WATER, E.P.A. 600-4/79-020, A.S.T.M., N.I.O.S.H. MANUAL, P.C.B., E.P.A., 5W 846-B. ALL CURRENT EDITIONS.

attachment A

6540 Diplomat Drive Sterling Heights, Michigan 48078-7258 (313) 731-1818 Outside Michigan Dial 1-800-368-5227 Fax Line 313-731-2590

INLAND WATERS 24354 KING RD. BROWNSTOWN TWP., MI 48174

ATTN: JOEL DUELING

DATE REPORTED: 9-14-88
DATE RECEIVED: 9-7-88

LAB NO. 1113-B

DESCRIPTION AND SAMPLE NUMBER COMPOSITE OF 3, 12, 20, 29, 32 SAMPLE MATTRIX REPORT OF ANALYSIS

			============			
EXTRACTION PRO	OCEDURE - LEAC					
(all results i	in ppm or mg/	(ppm or mg/l)	SW 846-B			
			•			
ARSENIC	= *LESS THAN	0.01	5.0	7061		
BARIUM	= LESS THAN	0.5	100.0	7080		
CADMIUM	= LESS THAN	0.5	1.0	7130		
CHROME, TOT.	= LESS THAN	0.5	5.0	7190		
COPPER	= LESS THAN	0.5	100.0	7210		
LEAD	= LESS THAN	0.5	5.0	7420		
MERCURY	= LESS THAN	0.01	0.2	7470		
SILVER	= LESS THAN	0.5	5.0	7760		
SELENIUM	= LESS THAN	0.01	1.0	7741		
ZINC	= 24.0		500.0	7950		
<b>IGNITABILITY</b>	= 108 <sup>O</sup> F		BELOW 140	DEGREE F		
			SEC. 2.1.1	1010		
CORROSIVITY (	pH) = 7.85		less than or =	to 2 or		
greater than or = 13. 1110						
REACTIVITY		<u>-</u>				
as Reactive	e Cyanide =LE	SS THAN 1.0	mg/Kg 250	9010		
as Reactive Sulfide =LESS THAN 10.0 mg/Kg 500 9030						

THOMAS S. MEGNA, M.S., LAB DIRECTOR TONCEMAN

\*NOTE: TERM LESS THAN DENOTES DETECTION LIMIT OF TEST.

REFERENCES: STANDARD METHODS FOR EXAMINATION OF WATER, E.P.A. 600-4/79-020, A.S.T.M., N.I.O.S.H. MANUAL, P.C.B., E.P.A.,

SW 846-B. ALL CURRENT EDITIONS.

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INLAND WATERS
24354 KING RD.
BROWNSTOWN TWP., MI 48174

ATTN: JOEL DUELING

DATE RECEIVED: 9-7-88

LAB NO. 1113-C

DESCRIPTION AND SAMPLE NUMBER COMPOSITE OF 4, 17, SAMPLE MATTRIX
REPORT OF ANALYSIS

EXTRACTION PROCEDURE - LEACHEATE (all results in ppm or mg/l)					Έ		ARDS or mg/l)	METHOD SW 846-B
ARSENIC	= .	*LESS	THAN	0.01		5	5.0	7061
BARIUM	=	LESS	THAN	0.5		100	0.0	7080
CADMIUM	=	LESS	THAN	0.5			.0	7130
CHROME, TOT.	=	LESS	THAN	0.5		` 5	5.0	7190
COPPER	=		THAN	0.5			0.	
LEAD MERCURY	=	LESS	THAN	0.5		5	5. <b>0</b>	7420
MERCURY	=	LESS				(	.2	7470
SILVER	=	LESS	THAN	0.5		9	5.0	7760
SELENIUM	=	LESS	THAN	0.01	_	1	L.O	7741
ZINC	=	1.7				500	0.0	7950
IGNITABILITY	=	118 <sup>O</sup> F	•			BI	ELOW 140	DEGREE F
·						SI	EC. 2.1.1	1010
CORROSIVITY	(Hq)	= 4.9	0			less t	han or =	to 2 or
					greate	er than o	or = 13.	1110
REACTIVITY					•			
as Reactiv	as Reactive Cyanide =LESS THAN 1.0 mg/Kg 250 9010							
as Reactive Sulfide =LESS THAN 10.0 mg/Kg 500 9030								

\*NOTE: TERM LESS THAN DENOTES DETECTION LIMIT OF TEST.

THOMAS S. MEGNA, M.S., LAB DIRECTOR

REFERENCES: STANDARD METHODS FOR EXAMINATION OF WATER, E.P.A. 560-4/79-020, A.S.T.M., N.I.O.S.H. MANUAL, P.C.B., E.P.A., SW 846-B. ALL CURRENT EDITIONS.

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INLAND WATERS 24354 KING RD. BROWNSTOWN TWP., MI 48174

ATTN: JOEL DUELING

DATE REPORTED: 9-14-88 DATE RECEIVED: 9-7-88

LAB NO. 1113-D

SAMPLE MATTRIX

DESCRIPTION AND SAMPLE NUMBER COMPOSITE OF 6, 11, 15, 27, 33, 34, 39-BOTTOM LAYER

REPORT OF ANALYSIS

	===	=====	=====	=====	=====			
EXTRACTION PROCEDURE - LEACHEATE STANDARDS METHOD							METHOD	
(all results	in	ppm or	mg/l	L ),		(ppm or	mg/1)	SW 846-B
								• ,
ARSENIC	=	*LESS	THAN	0.01		5.0		7061
BARIUM	=	LESS	THAN	0.5		100.0		7080
CADMIUM	=	LESS	THAN	0.5		1.0	•	7130
CHROME, TOT.	=	LESS	THAN	0.5		5.0		7190
COPPER	=	LESS	THAN	0.5		100.0		7210
LEAD	=	LESS	THAN	0.5		5.0		7420
MERCURY	=	LESS	THAN	0.01		0.2		7470
SILVER	=	LESS	THAN	0.5		5.0		7760
SELENIUM	=	LESS	THAN	0.01		1.0		7741
ZINC	=	2.3				500.0		7950
IGNITABILITY	=	106 <sup>0</sup> 1	ទ			BELO	W 140	DEGREE F
						SEC.	2.1.1	1010
CORROSIVITY (	pH)	= 9.0	O,			less tha	n or =	to 2 or
greater than or = $13.$ $1110$								
REACTIVITY								
as Reactiv	e C	yanide	e =LES	SS TH	N 1.0	mg/Kg 25	0	9010
as Reactive Sulfide =LESS THAN 10.0 mg/Kg 500 9030								

\*NOTE: TERM LESS THAN DENOTES DETECTION LIMIT OF TEST.

THOMAS S. MEGNA, M.S., LAB DIRECTOR

REFERENCES: STANDARD METHODS FOR EXAMINATION OF WATER, E.P.A. 600-4/79-020, A.S.T.M., N.I.O.S.H. MANUAL, P.C.B., E.P.A., SW 846-B. ALL CURRENT EDITIONS.

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INLAND WATERS 24354 KING RD. BROWNSTOWN TWP., MI 48174

ATTN: JOEL DUELING

DATE REPORTED: 9-14-88 DATE RECEIVED: 9-7-88 LAB NO. 1113-E

DESCRIPTION AND SAMPLE NUMBER COMPOSITE OF 7, SAMPLE MATTRIX

REPORT OF ANALYSIS

EXTRACTION PROCEDURE - LEACHEATE	STANDARDS	METHOD				
(all results in ppm or mg/l)	(ppm or mg/1)	SW 846-B				
ARSENIC = 0.03	5.0	7061				
BARIUM = *LESS THAN 0.5	100.0	7080				
CADMIUM = LESS THAN 0.5	1.0	7130				
CHROME, TOT. = LESS THAN 0.5	5.0	7190				
COPPER = LESS THAN 0.5	100.0	7210				
LEAD = LESS THAN $0.5$	5.0	7420				
MERCURY = LESS THAN 0.01	0.2	7470				
SILVER = LESS THAN 0.5	5.0	7760				
SELENIUM = LESS THAN 0.01	1.0	7741				
ZINC = LESS THAN 0.5	500.0	7950				
IGNITABILITY = 99°F	BELOW 140	DEGREE F				
	SEC. 2.1.1	1010				
CORROSIVITY (pH) = 7.9	less than or =	to 2 or				
greater	than or $= 13$ .	1110				
REACTIVITY						
as Reactive Cyanide =LESS THAN 1.0	mg/Kg 250	9010				
as Reactive Sulfide =LESS THAN 10.0	0 mg/Kg 500	9030				

\*NOTE: TERM LESS THAN DENOTES DETECTION LIMIT OF TEST.

THOMAS S. MEGNA, M.S., LAB DIRECTOR

REFERENCES: STANDARD METHODS FOR EXAMINATION OF WATER, E.P.A. 600-4/79-020, A.S.T.M., N.I.O.S.H. MANUAL, P.C.B., E.P.A., SW 846-B. ALL CURRENT EDITIONS.

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INLAND WATERS 24354 KING RD. BROWNSTOWN TWP., MI 48174

ATTN: JOEL DUELING

DATE REPORTED: 9-14-88 DATE RECEIVED: 9-7-88

LAB NO. 1113-F

DESCRIPTION AND SAMPLE NUMBER SAMPLE MATTRIX REPORT OF ANALYSIS

COMPOSITE OF 2, 8-BOTTOM LAYER, 9, 13, 14, 24, 28, 31, 35, 36, 38, 39-TOP, 43, 48, 49

EXTRACTION PR		METHOD mg/l) SW 846-B
ARSENIC	*LESS THAN 0.01 5.0	7061
	LESS THAN 0.5 100.0	7080
CADMIUM		
CHROME, TOT.	LESS THAN 0.5 5.0	
COPPER		
LEAD	·	7420
MERCURY	•	7470
SILVER	LESS THAN 0.5 5.0	7760
SELENIUM	LESS THAN 0.01 1.0	7741
ZINC	3.6 500.0	7950
IGNITABILITY	120 °F BELOW	140 DEGREE F
		2.1.1 1010
CORROSIVITY (	) = 6.5 less than	or = to 2 or
·	greater than or =	13. 1110
REACTIVITY	*	47
as Reactiv	Cyanide =LESS THAN 1.0 mg/Kg 250	9010
	Sulfide =LESS THAN 10.0 mg/Kg 500	

\*NOTE: TERM LESS THAN DENOTES DETECTION LIMIT OF TEST

THOMAS S. MEGNA, M.S., LAB DIRECTOR

REFERENCES: STANDARD METHODS FOR EXAMINATION OF WATER, E.P.A. 600-4/79-020, A.S.T.M., N.I.O.S.H. MANUAL, P.C.B., E.P.A., SW 846-B. ALL CURRENT EDITIONS.

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Fax Line 313-731-2590

INLAND WATERS 24354 KING RD. BROWNSTOWN TWP., MI 48174

ATTN: JOEL DUELING

DATE REPORTED: 9-14-88 DATE RECEIVED: 9-7-88

LAB NO. 1113-G

DESCRIPTION AND SAMPLE NUMBER COMPOSITE OF 8-TOP, 16, 18, 22, SAMPLE MATTRIX

26, 30, 37, 44

REPORT OF ANALYSIS

STANDARDS METHOD EXTRACTION PROCEDURE - LEACHEATE (ppm or mg/l) SW 846-B (all results in ppm or mg/l) ARSENIC = \*LESS THAN 0.01 5.0 7061 7080 = LESS THAN 0.5 100.0 BARIUM CADMIUM = LESS THAN 0.5 1.0 7130 CHROME, TOT. = LESS THAN 0.5 5.0 7190 100.0 COPPER = LESS THAN 0.57210 5.0 = LESS THAN 0.5 LEAD 7420 = LESS THAN 0.01 MERCURY 0.2 7470 = LESS THAN 0.5 5.0 7760 SILVER SELENIUM = LESS THAN 0.01 1.0 500.0 1.1 7950 ZINC  $IGNITABILITY = 75^{O}F$ BELOW 140 DEGREE F SEC. 2.1.1 1010 CORROSIVITY (pH) = 8.0less than or = to 2 or greater than or = 13. 1110 REACTIVITY as Reactive Cyanide =LESS THAN 1.0 mg/Kg 250 9010 9030

as Reactive Sulfide =LESS THAN 10.0 mg/Kg 500

\*NOTE: TERM LESS THAN DENOTES DETECTION LIMIT OF TEST.

THOMAS S. MEGNA, M.S., LAB DIRECTOR

REFERENCES: STANDARD METHODS FOR EXAMINATION OF WATER, E.P.A. 600-4/79-020, A.S.T.M., N.I.O.S.H. MANUAL, P.C.B., E.P.A., SW 846-B. ALL CURRENT EDITIONS.

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TNLAND WATERS 24354 KING RD. BROWNSTOWN TWP., MI 48174

ATTN: JOEL DUELING

DATE REPORTED: 9-14-88
DATE RECEIVED: 9-7-88
LAB NO. 1113-H

DESCRIPTION AND SAMPLE NUMBER COMPOSITE OF 5, 19, 23
SAMPLE MATTRIX
REPORT OF ANALYSIS

	ROCEDURE - LEACHEATE in ppm or mg/l)	STANDARDS (ppm or mg/l)	METHOD SW 846-B
ARSENIC	= *LESS THAN 0.01	5.0	7061
BARIUM	= LESS THAN 0.5	100.0	7080
CADMIUM	= LESS THAN 0.5	1.0	7130
CHROME, TOT.	= LESS THAN 0.5	5.0	7190
COPPER	= LESS THAN 0.5	100.0	7210
LEAD	= LESS THAN 0.5	5.0	7420
MERCURY	= LESS THAN 0.01	0.2	7470
SILVER	= LESS THAN 0.5	5.0	7760
SELENIUM	= LESS THAN 0.01	1.0	7741
ZINC	= 0.6	500.0	7950
IGNITABILITY	= GREATER THAN 212	OF BELOW 140 DEG	REE F
		SEC. 2.1.1	. 1010
CORROSIVITY	(pH) = 8.6	less than or =	to 2 or
	gr	eater than or $= 13$ .	1110
REACTIVITY	_	·	,
as Reactiv	ve Cyanide =LESS THAN	1.0 mg/Kg 250	9010
as Reacti	ve Sulfide =LESS THAN	10.0 mg/Kg 500	9030

\*NOTE: TERM LESS THAN DENOTES DETECTION LIMIT OF TEST.

THOMAS S. MEGNA, M.S., LAB DIRECTOR

REFERENCES: STANDARD METHODS FOR EXAMINATION OF WATER, E.P.A. 600-4/79-020, A.S.T.M., N.I.O.S.H. MANUAL, P.C.B., E.P.A., SW 846-B. ALL CURRENT EDITIONS.

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INLAND WATERS 24354 KING RD. BROWNSTOWN TWP., MI 48174

ATTN: JOEL DUELING

DATE REPORTED: 9-14-88
DATE RECEIVED: 9-7-88
LAB NO. 1113-I

DESCRIPTION AND SAMPLE NUMBER COMPOSITE OF 21, SAMPLE MATTRIX
REPORT OF ANALYSIS

EXTRACTION PR				METHOD mg/l) SW 846-B		
ARSENIC	=·*L	ESS THAN	0.01	5.0	7061	
BARIUM	= L	ESS THAN	0.5	100.0	7080	
CADMIUM	= L	ESS THAN	0.5	1.0	7130	
CHROME, TOT.	= L	ESS THAN	0.5	5.0	7190	
COPPER		ESS THAN	0.5	100.0	7210	
LEAD	= I	ESS THAN	0.5	5.0	7420	
MERCURY	= L	ESS THAN	0.01	0.2	7470	
SILVER		ESS THAN		5.0	7760	
SELENIUM	= L	ESS THAN	0.01	1.0	7741	
ZINC	= I	ESS THAN	0.5	500.0	7950	
IGNITABILITY	= 1	.61 <sup>0</sup> F		BELOW 140	DEGREE F	
				SEC. 2	2.1.1 1010	
CORROSIVITY	(Hq	13.5		less than	or = to 2 or	
			grea	ter than or =	13. 1110	
REACTIVITY						
as Reactiv	re Cya	nide =LE	SS THAN 1	.0 mg/Kg 250	9010	
as Reactive Sulfide =LESS THAN 10.0 mg/Kg 500 9030						

\*NOTE: TERM LESS THAN DENOTES DETECTION LIMIT OF TEST.

THOMAS S. MEGNA, M.S., LAB DIRECTOR

REFERENCES: STANDARD METHODS FOR EXAMINATION OF WATER, E.P.A. 600-4/79-020, A.S.T.M., N.I.O.S.H. MANUAL, P.G.B., E.P.A., SW 846-B. ALL CURRENT EDITIONS.

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INLAND WATERS 24354 KING RD. BROWNSTOWN TWP., MI 48174

ATTN: JOEL DUELING

DATE REPORTED: 9-14-88 DATE RECEIVED: 9-7-88 LAB NO. 1113-J

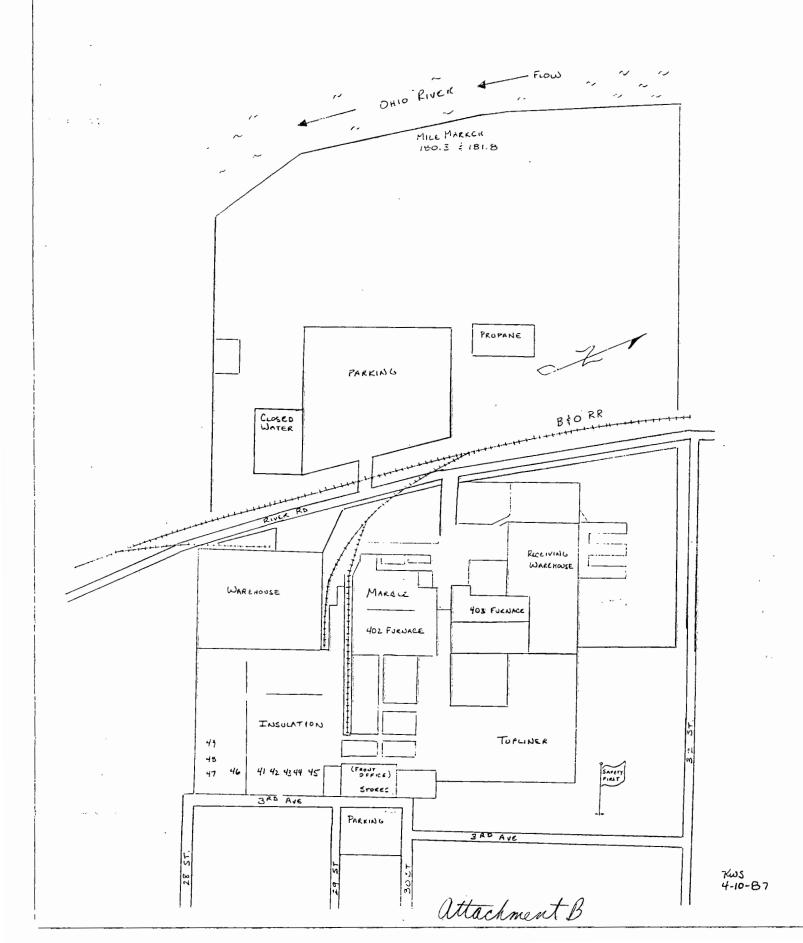
DESCRIPTION AND SAMPLE NUMBER COMPOSITE OF 10, 25, 50 SAMPLE MATTRIX REPORT OF ANALYSIS

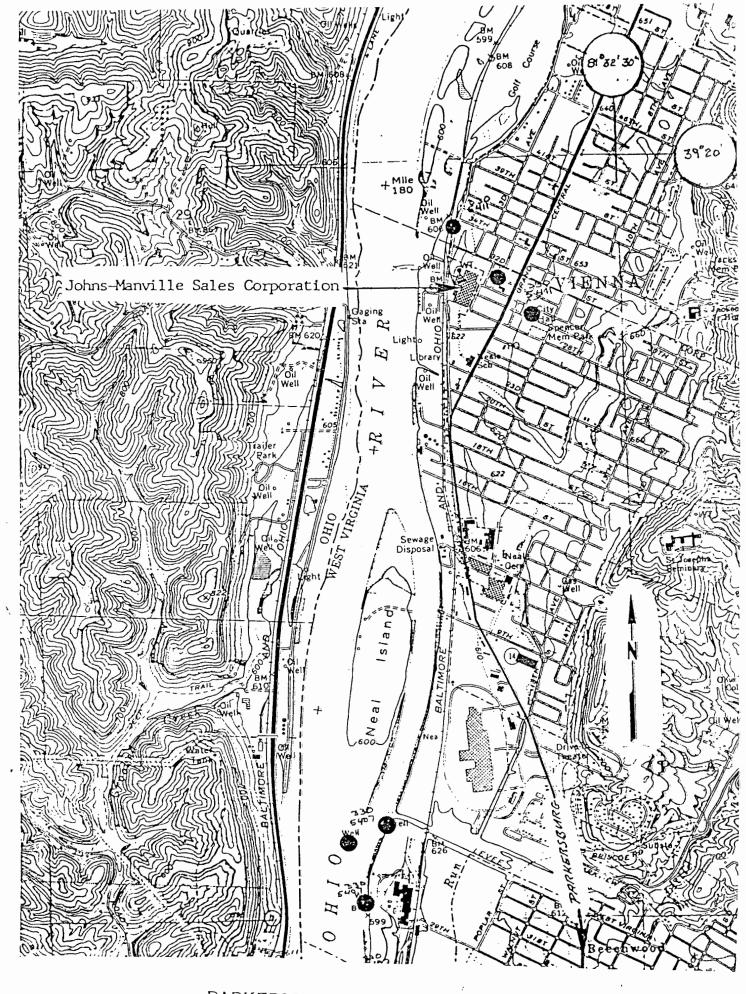
EXTRACTION PROCEDURE - LEACHEATE STANDARDS METHOD							
(all results	ppm or mg/l) (ppm or mg/l) SW	846-B					
ARSENIC	*LESS THAN 0.01 5.0 700	51					
BARIUM	LESS THAN 0.5 100.0 708	30					
CADMIUM	LESS THAN 0.5 1.0 713	30					
CHROME, TOT.	LESS THAN 0.5 5.0 719	<b>90</b>					
COPPER	LESS THAN 0.5 100.0 72	10					
LEAD	LESS THAN 0.5 5.0 743	20					
MERCURY	LESS THAN 0.01 0.2 74	70					
SILVER	LESS THAN 0.5 5.0 77	60					
	LESS THAN 0.01 1.0 77	41					
ZINC	6.9 500.0 79	50					
IGNITABILITY	113 °F BELOW 140 DEGREE	F					
	SEC. 2.1.1 10	10					
CORROSIVITY							
greater than or = 13. 1110							
REACTIVITY							
as Reactiv	Cyanide =LESS THAN 1.0 mg/Kg 250 9	010					
	as Reactive Sulfide =LESS THAN 10.0 mg/Kg 500 9030						

\*NOTE: TERM LESS THAN DENOTES DETECTION LIMIT OF TEST.

THOMAS S. MEGNA, M.S., LAB DIRECTOR

REFERENCES: STANDARD METHODS FOR EXAMINATION OF WATER, E.P.A. 600-4/79-020, A.S.T.M., N.I.O.S.H. MANUAL, P.C.B., E.P.A., SW 846-B. ALL CURRENT EDITIONS.





PARKERSBURG, W. VA. - OHIO

attachment C